

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	16/06/2026
Application number:	PL/2026/02872
Proposal:	The replacement of BBQs and block paving extensions to cycle parking on a number of existing lodges. 8no. lodges will include patio extensions.
Site address:	Center Parcs, Picket Post, Corsley, Warminster, BA12 7PU
Case officer:	David Cox

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
a)	GCN	Habs Regs, CP50	16/06/2026 -Mitigation strategy is unconfirmed and to be "designed under the EPS licence application". Please could the applicant provide clear details of their GCN mitigation approach, as well as compensatory features?	
b)	BNG	Environment Act 2021, Town and Country Planning Order 2015, CP50	16/06/2026 -Clarification of redline boundary and on-site/off-site BNG area	

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:

- Site Location Plan, Jackson Design Associates, February 2026
- Existing and Proposed Cluster Plans, Jackson Design Associates, February 2026

- Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment, Morph Ecological Consultants, April 2026
- Statutory Biodiversity Metric, Nikki Morton, March 2026

The site comprises an area of a holiday site containing existing holiday lodges. Much of the wider site comprises woodland, grassland, lakes and ponds. It is proposed to replace BBQs and paving, and extend patio areas of 8 lodges.

COMMENTS:

Salisbury Plain Special Protection Area (SPA) 6.4km buffer

Part of the application site lies within the 6.4km zone of influence of the Salisbury Plain SPA and potential impact of recreational pressure on stone curlew, in combination with other plans and projects, must be considered.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). This concluded that given the scale and nature of the development (there will be no additional overnight accommodation created), there is no overall mechanism for adverse effect. The HRA has concluded that the application is not likely to have significant impacts on Salisbury Plain SPA and **subsequently the application is screened out of Appropriate Assessment.**

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.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). This concluded that since there is no proposal to create any additional overnight accommodation, there would be no overall mechanism for adverse effect. The HRA has concluded that the application is not likely to have significant impacts on the SAC and **subsequently the application is screened out of Appropriate Assessment.**

Protected species and habitats

Bats

The development area was assessed for signs of roosting bats. Some potential roosting features were noted on the lodges, but the ecology report states “*none of the potential roosting features will be directly impacted by the works*”. Therefore, subject to the precautions detailed in Section 4.2.3 – including pre-commencement checks of potential bat roosting features if works are undertaken during the summer – it is considered that the risk posed to roosting bats can be appropriately managed.

Compliance with the Precautionary Working Measures/Section 4.2.3 of the ecology report must be secured via a planning condition. Should bats or any evidence of bats be found in the areas to be impacted, works to those areas must cease immediately and a professional ecologist be contacted.

The ecology report also proposes the addition of six bat boxes. **Details of these features should be provided on an ecological enhancements plan, to be secured via condition.**

Great Crested Newts

There is a known Great Crested Newt (GCN) breeding pond within 50m of the application site that is part of an inter-connected ribbon lake system within the wider site. There are further records of an increasing GCN population within these ribbon lakes/ponds. Most of the works will be confined to areas of existing patio and mown grass. However, the woodland areas are broadly suitable for use by GCN during their terrestrial phase.

GCN are a European Protected Species afforded stringent protection under the Conservation of Habitats and Species Regulations 2017 (as amended) and as such are a material consideration within the planning consultation process. The ecology report confirms that an EPS Mitigation Licence will be sought for the lawful construction of this development. It is understood that it may be possible to fully confine the works to areas unsuitable for use by GCN, thereby the Low Impact Class Licence site registration may be an option.

The mitigation outlined in the ecology report is, at present, somewhat unclear. Section 4.2.1 of the report states “*mitigation would be designed under [the licence application]*” but is *likely* to include hand searches and making the work areas unsuitable for GCN. It is suggested that some hibernacula and log piles will be provided, but the number and locations are not shown. **As such, a final mitigation and compensation strategy must be submitted to demonstrate that adequate mitigation can be achieved with the development.**

Badgers

No signs of badgers were observed within the survey areas, despite a potential record of a sett to the rear of Cluster C, but this area was found to be absent of sett entrances. Badgers are known to occur in the wider site. Under the Protection of Badgers Act 1992, it is an offence to harm badgers or damage or destroy their setts or disturb badgers within their setts. Planning permission for development does not provide a defence against prosecution under these legislations. The applicant is advised to seek advice from an independent ecologist should badgers become present within, or adjacent to, the site boundaries, prior to or during the construction works. **Precautionary measures for badgers should be included within a Construction Environmental Management Plan (CEMP).**

Other

The adults, young, eggs and nests of all species of birds are protected by the Wildlife and Countryside Act 1981 (as amended) while they are breeding. Please be advised that works should not take place that will harm nesting birds (such as vegetation clearance or building demolition) from March to August inclusive. The applicant is advised that any structure or vegetation capable of supporting breeding birds should be checked, and the removal or altering of such features delayed until after young birds have fledged.

The works will be predominately confined to the existing buildings and hardstanding, but surrounding areas of woodland may be impacted. **As such, considering that reptiles and dormice have been recorded within the wider site, precautionary measures to ensure the risk posed to these species remains minimal should be detailed within the CEMP.**

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.

A completed statutory metric calculation, condition assessments and map (Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment, Morph Ecological Consultants, April 2026; Statutory Biodiversity Metric, Nikki Morton, March 2026) stating the baseline and predicted post-development biodiversity units of the site have been submitted.

The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	0.08 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.

The ecology report refers to an on-site enhancement area, shown in Appendix 1, approximately 550m southeast of the development area. This BNG enhancement area is not included within the submitted plans (such as the Site Location Plan). The redline application boundary and site boundary used for the BNG assessment must match.

If the proposed BNG area is located outside of the redline boundary, it is considered “off-site” ([Make off-site biodiversity gains as a developer - GOV.UK](#)). All off-site biodiversity gains sites must be registered on the national biodiversity gains site register. Guidance on how to register a biodiversity gains site including a list of items required to apply can be found here - [Register a biodiversity gain site - GOV.UK](#). In order for the Biodiversity Gain Plan condition to be discharged, all off-site gains must be shown on the Biodiversity Gain Plan as allocated to this development on the national biodiversity gains site register.

Off-site gains must be secured via a legal agreement for at least 30 years. This must be a planning obligation (Section 106 agreement) or conservation covenant. Wiltshire Council will not enter into a Section 106 agreement for off-site gains unless the off-site gain site has been verified. Contact ecologychargeableservice@wiltshire.gov.uk to request further information on site verification.

If the proposed BNG can be contained on-site within the redline boundary, it should also be noted that it would be considered ‘significant’ due to the BNG proposed (involving a change in habitat of low to medium distinctiveness), and as identified in the ecology report. As such, in order for the council to fulfil its BNG monitoring responsibilities, a Habitat Management and Monitoring Plan (HMMP) would be required, as well as a BNG monitoring contribution to be secured via a separate legal agreement. In this case, the BNG monitoring 30-year contribution for minor applications would apply, which is currently set at £6,200.00.

Please can the applicant clarify whether the BNG enhancement will be included within the site’s plans/redline boundary?

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 addressed

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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