

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	16/06/2026
Application number:	PL/2026/02518
Proposal:	Demolition of existing buildings and removal of footpaths, fences and cycle store. Erect new Santa's Grotto building, ranger hut building, teepee, bike park and dog exercise area alongside associated infrastructure including footpaths, illuminated walkway, bike park, fire pit, buggy park, reindeer hut and seating, Creation of a newt pond. Temporary erection of a festive food kiosk and two stores (November to February)
Site address:	Center Parcs, Picket Post, Corsley, Warminster, BA12 7PU
Case officer:	Jemma Foster

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 -Additional pond (compensation/mitigation) details	
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:

- Planning Statement, STAT Planning, April 2026
- Design & Access Statement, Jackson Design Associates, February 2026

- Proposed Landscape Plan, Jackson Design Associates, March 2026
- Existing Site Plan, Jackson Design Associates, November 2025
- Site Location Plan, Jackson Design Associates, November 2025
- Preliminary Ecological Appraisal, Bat Surveys, and Biodiversity Net Gain Assessment, Morph Ecological Consultants, April 2026
- Statutory Biodiversity Metric, Nikki Morton, April 2026

The site comprises a section of land within an existing holiday site (Center Parcs) where it is proposed to demolish multiple buildings and construct a new Santa's Grotto, dog walking area, new path and light trail, and associated infrastructure. The site currently contains a cycle park, activities hut, footpath and grotto.

COMMENTS:

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. The Ranger's Lodge and Reindeer Building were assessed as having low and moderate suitability for use by roosting bats, respectively. Accordingly, emergence surveys were undertaken in August-September 2025 in line with best practice guidelines. No roosting bats were noted, and activity was low (a small number of pipistrelle and noctules was recorded).

Four trees are scheduled to be removed, with limited-no bat roosting features observed. The ecology report recommends a precautionary approach involving pre-work inspections using endoscopes – **full details should be provided within a Construction Environmental Management Plan, to be secured via a condition.** Further, the report recommends a wildlife-sensitive lighting scheme and installation of bat boxes. **These measures should be secured through the appropriate conditions.**

Great Crested Newts

There is a known Great Crested Newt (GCN) breeding pond within 40m 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. The pond within 40m supports the largest number of GCN within Center Parcs, with rangers recording a 2025 peak count of 145 individuals in one night. Data are available from annual survey work.

There are two small artificial ponds within the redline boundary, but these are ornamental, artificially lined and lack aquatic vegetation, thereby being unsuitable for use by breeding GCN. Most of the works will be confined to areas of bare ground. However, there are some other

features within the application site that are suitable for use by GCN during their terrestrial phase, including woodland and log piles, that will be somewhat impacted by the proposal.

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. An EPS Mitigation Licence will be sought for the lawful construction of this development. The ecology report outlines a proposal to use Natural England's Policy 1 route, which permits 'reduced' mitigation measures where compensation is increased. In this case, it is acknowledged that exclusion and translocation exercises would be difficult to achieve given the existing high-level of use of the holiday park. It is therefore proposed to adopt a precautionary approach, outside of the active GCN period, using supervised destructive searches. Compensation will include the restoration of bare ground and buildings to woodland, as well as a new pond specifically for GCN that will remain disconnected from the existing breeding ponds (to improve threat resilience).

Whilst this mitigation/compensation is acceptable in principle, limited details of the proposed pond have been provided, with the site plan noting that the pond layout is indicative only with the final layout yet to be determined, thereby creating difficulty in securing the pond at permission. The ecology report states that the pond will not be impacted by guests, but it is unclear how this can be managed. Further, a pond profile, final plant mixes, and marked hibernacula locations are not shown. **Additional information regarding the GCN mitigation/compensation strategy is therefore needed prior to determination of the application.**

Badgers

No signs of badgers were observed within the survey areas, but they 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 the CEMP.**

Other

Multiple old bird's nests were observed during the survey. 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. Structures or vegetation capable of supporting breeding birds should be checked prior to commencement, and any removal or altering of such features should be delayed until after young birds have fledged.

Considering that reptiles and dormice have also been recorded within the wider site, precautionary measures to ensure the risk posed to these species – and the surrounding habitats – 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, map (*Preliminary Ecological Appraisal, Bat Surveys, and Biodiversity Net Gain Assessment, Morph Ecological Consultants, April 2026; Statutory Biodiversity Metric, Nikki Morton, April 2026*) and condition assessment sheets demonstrating the baseline and predicted post-development biodiversity units of the site have been submitted. The baseline is summarised below:

On-site pre-development (baseline) biodiversity value	3.38 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, east 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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