

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	16/03/2026 19/06/2026 updated comments
Application Number:	PL/2025/10007
Proposal:	Outline planning application for the erection of up to 77 dwellings, public open space, landscaping and sustainable urban drainage system, with vehicular access off Ashley Coombe. All matters reserved except for means of access.
Site Address:	Land off Ashley Coombe, Warminster, Ashley Coombe, BA12 9QU
Case Officer:	Steven Sims

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	River Avon Special Area of Conservation (SAC) Hampshire Catchment	Habs Regs, NPPF, CP50	16/03/2026 19/06/2026 A completed River Avon SAC: nutrient neutrality calculators in an unlocked Excel file must be submitted with the correct information must submitted. Details of nutrient mitigation strategy.	NO
2	Ecological Enhancements	CP50, NPPF	16/03/2026 Enhancement measures suggested in ecological impact assessment to be shown on site drawings/plans including bat and bird box locations.	YES 19/06/2026 • PL/2025/10007: Ecological Parameters Plan. May 2026. Stark Ecology Ltd.
3	Ecological Parameters Plan	CP50, NPPF	16/03/2026 Provision of a suitably detailed Ecological Parameters Plan (EPP).	YES 19/06/2026 • PL/2025/10007: Ecological Parameters Plan. May 2026. Stark Ecology Ltd.

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 your consultation on the above application. I have reviewed the submitted documents against OS maps, aerial photographs of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- [PL/2025/10007: Ecological Parameters Plan. May 2026. Stark Ecology Ltd;](#)
- Ecological Impact Assessment Report. November 2025. Stark Ecology Ltd;
- [Natural England Nutrient Neutrality budget calculator for the River Avon SAC;](#)
- [Nutrient Neutrality Assessment and Mitigation Strategy. 15 April 2026. Stantec UK. Project No. 332612941. Rev. B;](#)
- The Statutory Biodiversity Metric. 27 November 2025. v1;
- [BS:5837 Arboricultural Survey. 23 June 2025. David Jarvis Associates Limited. Rev. P1;](#)
- BS:5837 Compliant Arboricultural Impact Assessment & Arboricultural Method Statement. 24 November 2025. David Jarvis Associates. Ref. 3396-4-4-AIA-0001-S1-P1 Ashley Coombe. Report No. S1. Rev. P1;
- Parameter Plan: Green Infrastructure. November 2025. OG Design. Project No. RL120. Drawing No. 202;
- Illustrative Layout. December 2025. OG Design. Project No. RL102. Drawing No. 120. Rev. D;
- Planning and Affordable Housing Statement. December 2025. OG Group. Ref. RL102PS;
- Design and Access Statement. OG Urban Design.

Salisbury Plain Special Area of Conservation (SPA)

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 January 2026 Natural England (NE) confirmed that the 2026 strategic AA for Salisbury Plain SPA continues to be supported by NE.

Hampshire River Avon Special Area of Conservation (SAC) 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:

- ~~1. Two separate nutrient calculations have been provided, one with the SuDS tab completed and one without. Clarification is required as to whether SuDS are being proposed as part of the mitigation strategy. If SuDS are being relied upon as mitigation, the nutrient calculation should include this information and one nutrient budget should be submitted reflecting the final mitigation approach. Further note: Depending on the type of mitigation proposed, additional or revised nutrient budget calculations may be required.~~
- ~~2. The nutrient calculation records 80 units/dwellings. However, the planning application and planning statement describe the proposal as an "Outline planning application for the erection of up to 77 dwellings." The nutrient budget must accurately reflect the development being applied for. The~~

calculator should therefore be updated to ensure the number of dwellings entered aligns with the proposed development.

- ~~3. Current Land Use: The nutrient budget records the current land use as 'greenspace'. According to the UK Gov guidance on using the nutrient neutrality calculators ([Using the nutrient neutrality calculators - GOV.UK](#)) Greenspace is defined as: "Natural and semi-natural outdoor spaces provided for recreational use where fertilisers will not be applied and dog waste is managed. For example, semi-natural parks. This does not include green infrastructure within the built urban environment, such as sports fields, gardens, or grass verges, as these are included in the residential urban land category." Further information and justification is required to demonstrate how the land in question is functionally and physically managed as greenspace. This information is necessary to ensure the nutrient budget accurately reflects the existing land use. Based on the currently available information, a more appropriate land use classification within the nutrient calculator may be "Mixed."~~
4. Confirmation of the proposed mitigation strategy is required. The updated Nutrient Neutrality Assessment and Mitigation Strategy (15 April 2026) indicates that the applicant intends to achieve nutrient neutrality through the purchase of third-party phosphorus credits. Further detail is required before the LPA, can undertake and conclude an Appropriate Assessment (AA) under the Habitats Regulations.
 - Evidence must be submitted to demonstrate compliance with the mitigation scheme. This should include a credit purchase certificate or equivalent evidence (such as proof of purchase or a legal agreement) confirming that sufficient mitigation has been secured.
 - Natural England approval is required for any proposed third-party P-mitigation schemes. **It is recommended that in such cases the applicant consults Natural England under their Discretionary Advice Service (DAS).**
 - Wiltshire Council operates a Nutrient Neutrality Credit Scheme verification and approval process to allow mitigation schemes to be registered in the catchment. It is advised that the credit supplier registers their scheme through this process. Confirmation of this verification, must be submitted to the Council as part of the application. Further information can be found on our website: [Phosphorus and nitrogen mitigation - Wiltshire Council](#)
5. As an alternative to the bespoke scheme, the applicant may opt to participate in the Wiltshire Council Credit Scheme. 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. 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](#).

Further details of the proposed mitigation strategy is required, to enable an Appropriate Assessment to be concluded favourably.

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.

The Council, as competent authority needs to have certainty that the development proposals will not have an adverse effect on the integrity of the European site.

Bat Species

A number of trees surrounding the site were assessed for bat roosting features; however, no trees are located within the redline boundary for the site and are currently proposed for removal. Should the proposals change such that trees with potential roosting features are affected, further survey work would be required and mitigation measures would need to be reviewed and updated accordingly. Static monitoring and night-time activity surveys confirmed that bats, including barbastelle, lesser horseshoe and greater horseshoe, rely on

the habitats within the site when commuting and foraging through the surrounding landscape. Subject to the retention of key boundary features and the implementation of an appropriate lighting strategy, it is considered likely that the functionality of habitats within the site, and their availability for foraging and commuting bats, will not be adversely affected.

The habitat within the proposed development site and the surrounding area is suitable for roosting, foraging and commuting bats. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. Any new lighting should be for the purposes for safe access and security and be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals. Suitable lighting to ensure dark foraging and commuting routes can be retained could be secured via condition.

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 186 d). The Ecological Impact Assessment recommends the inclusion of bat and bird boxes, and hibernacula. The inclusion of integrated bat roosting and bird nesting boxes on the proposed dwellings should comprise integral features on new residential developments at the ratio of 1:1 feature to building. Locations should be chosen in consultation with a professional ecologist to ensure they are appropriately positioned, and the following details must be provided: location, number, type (include make/model, if appropriate) and positioning (height, aspect, surrounding habitat, as applicable). The locations of these features must be provided on site plan/elevation drawings and will become an enforceable part of the planning permission. Bird/bat boxes will continue to be available for birds/bats for the lifetime of the development.

Nesting Birds

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 from March to August inclusive. All British birds, their nests and eggs are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000 while birds are nesting, building nests and sitting on eggs. The applicant is advised to check any structure or vegetation capable of supporting breeding birds and delay removing or altering such features until after young birds have fledged. Damage to extensive areas that could contain nests/breeding birds should be undertaken outside the breeding season. This season is usually taken to be the period between 1st March and 31st August but some species are known to breed outside these limits.

Reptiles

The site provides suitable habitat for reptiles. A precautionary method of working must be undertaken including a sensitive (phased) vegetation clearance methodology between the months of April and October, carried out under the supervision of a suitably qualified ecologist. Reasonable avoidance measures should be included within a construction environment management plan (CEMP) which can be secured by condition.

Biodiversity Net Gain (BNG)

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 (27 November 2025. v1) confirming the baseline and predicted post-development biodiversity units of the site has been submitted (including the baseline condition assessment sheets and maps).

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	25.48 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

If planning permission is granted, a Biodiversity Gain Plan confirming how the development will meet the biodiversity gain objective must be submitted and approved prior to the commencement of the development.

The Biodiversity Gain Plan must be accompanied by a completed Biodiversity Metric with the following issues addressed:

- It is currently unclear whether the habitats listed within the creation tab of the metric correspond with the habitats shown on the illustrative layout plan. This should be clarified through the submission of a post-development habitat map linked to the metric (e.g. including habitat ID numbers) to demonstrate where each proposed habitat type will be delivered on site.
- The proposed creation of other neutral grassland in moderate/good condition is unlikely to be achievable in areas subject to high levels of shading and/or regular human disturbance, we would advise that the proposed condition should be revised to a more appropriate target.
- The nutrient budget identifies the inclusion of a Sustainable Urban Drainage System (SuDS) within the proposed habitats on site; however, this feature has not been recorded within the proposed habitats in the metric. All submitted documentation must align, and the same habitats should be consistently reflected across the metric and supporting documents.

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.

Ecological Parameters Plan (EPP)

An Ecological Parameters Plan (EPP) [has been provided](#). ~~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, water features, badger setts 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.~~

Any detailed design brought forward at the Reserved Matters stage will be expected to ensure the protection of retained trees and hedgerows and the incorporation of large, unlit green corridors to maintain the integrity of local ecological networks. The location, orientation and design of development plots and lighting will require careful consideration at the detailed design stage to ensure that a dark corridor can be maintained alongside important habitat features. The SuDS feature should be designed to provide a benefit for biodiversity. These measures will need to be fully detailed and secured through the Ecological Parameters Plan and subsequent Reserved Matters submissions.

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: these will be added once the issues above have been addressed

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

Ecologist	Date