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21st July 2026

Dear Steven Sims

PL/2026/03045 -Outline planning application for the erection of up to 49 dwellings with associated access, public open space, landscaping, drainage and associated infrastructure (all matters reserved except access). Land off Damask Way, Warminster.

Buglife - The Invertebrate Conservation Trust would like to make the following comments on the above planning application. Buglife submitted comments (3rd March 2021) to the previous planning application 20/07214/REM on this site for 28 dwellings.

Buglife objects to this planning application on the following grounds:

No invertebrate surveys to inform assessment

The Environmental Impact Assessment (EIA) (March 2026) highlights the presence of several important invertebrate species on site as identified by desk study records. These include two Priority Species as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, the Nationally Scarce Rugged Oil Beetle (*Meloe rugosus*) and the Vulnerable Small Heath butterfly (*Coenonympha pamphilus*). A Nationally Scarce solitary wasp *Lestiphorus bicinctus* is also known from the site as part of a diverse grassland assemblage.

Further records from Smallbrook Meadows Local Nature Reserve (LNR) which is located just 45m north of the site include the Priority Species Hornet Robberfly (*Asilus crabroniformis*), Deep-brown Dart moth (*Aporophyla lutulenta*) and the Endangered Wall butterfly (*Lasiommata megera*).

Considering the mosaic of habitats present, records of important species on site and the good connectivity between the site and Smallbrook Meadows LNR, invertebrate surveys are essential *prior* to a decision being made on this application. An invertebrate habitat assessment and any appropriate invertebrate surveys that are subsequently recommended should be undertaken by an invertebrate expert at the appropriate time of year. This is essential to be able to fully assess the potential impacts of the application and to inform mitigation and management proposals.

Potential impacts to designated sites

The site is located in a landscape of both statutory and non-statutory designated sites for nature conservation. The development site currently provides an important role in terms of connectivity of habitats to the north, east and south and acts as a buffer zone for the River Avon Special Area of Conservation (SAC) and River Avon System Site of Special Scientific Interest (SSSI). The site lies within the risk zone for the River

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Avon System SSSI which is located at its nearest point approximately 80m to the south. Strict adherence to pollution control measures will be necessary to prevent pollution to this protected site during construction and an increased risk of pollution events remains during operation.

The River Avon SAC/SSSI, Smallbrook Meadows LNR and the River Wylfe LNR will all be subject to increased recreational pressures from people and pets with the potential for degradation of habitats through impacts such as trampling of vegetation and nutrient enrichment.

Impacts to Priority Habitats

The site supports an important area of Priority Habitat Lowland Acid Grassland. Whilst the grassland is to be retained, its value for invertebrates will largely be dependent on the wider habitat mosaic present on site which includes other grassland habitat, scrub and the Priority Habitat Lowland Deciduous Woodland. The EIA states *“The Lowland dry acid grassland is likely to support an assemblage of less common invertebrate species. All other habitats are likely to support a typical range of invertebrate species”*. This assessment does not take into account that many invertebrates require a mosaic of habitats in close proximity to be able to complete their life cycles or account for the context of the site with connectivity to nearby high value invertebrate habitat.

Alongside the loss in overall area of the current habitat mosaic and fragmentation impacts, there is potential for habitat degradation during construction and operation.

With regard to connectivity, the site is also within the Wiltshire B-lines network². B-Lines have been mapped across the UK to connect our best remaining wildflower-rich habitats and are a prioritised network for landowners to focus their habitat creation and restoration efforts. The loss of any wildflower-rich habitat within this area, undermines efforts to restore pollinator habitat connectivity in the local area.

Inadequate mitigation proposals

The EIA commits to ensuring protection of retained habitat during construction through a Construction Environment Management Plan (CEMP) and that habitats will be retained and enhanced during operation through measures implemented through a Habitat Management Plan (HMP). These documents are not available to review at this stage of the application, and it is not clear how Biodiversity Net Gain will be delivered.

Only general mitigation approaches are outlined for invertebrates such as the enhancement of the acid grassland and woodland and creating habitat for pollinators. These proposals are not informed by invertebrate surveys and do not consider how to ensure the persistence of important species such as Rugged Oil Beetle on site.

While plans to create ‘diverse grassland’ may support a number of invertebrates the needs of the Rugged Oil Beetle are more complex, requiring solitary bees to complete their lifecycle and south-facing bare ground in which to dig their nests³. As Rugged Oil Beetles are only found where these conditions are all in place, any changes to these conditions will undoubtedly impact on their ability to survive on this site. For the impacts on the Rugged Oil Beetle to be adequately addressed, it is important that appropriate mitigation be proposed, based on up-to-date ecological information.

Whilst it is welcomed that habitat buffers around the site will provide some mitigation for light spill into the wider landscape, Artificial Lighting at Night (ALAN) will be increased on site with adverse impacts to

² <https://www.buglife.org.uk/our-work/b-lines/>

³ https://buglife.b-cdn.net/app/uploads/2020/07/Oil-Beetle-management-web_0.pdf

invertebrates. ALAN has numerous direct and indirect impacts on invertebrates, including exhaustion, increased predation, and a disrupted ability to navigate⁴. Rugged Oil Beetles are nocturnal and therefore sensitive to ALAN and provides a further example of how impacts have been inadequately assessed with no survey information to inform proposals. Buglife would also question the Lighting Impact Assessment placing this site within the suburban environmental zone for determining lighting limits when considering the sensitive location and with habitats largely unaffected by light pollution to the north, east and south.

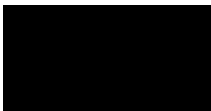
Increased recreational impacts from the development on retained habitats and designated sites is a concern. Whilst some measures are outlined to encourage recreation on the site, the EIA also states that protection of retained habitats will be achieved through fencing/signage. It is unclear what type of fencing will be installed that will also prevent dog access and Buglife would argue that impacts from recreation will not be able to be fully mitigated.

To summarise, there is inadequate information to determine this application. Though some important habitat will be retained on site, the species dependent on them will be impacted by loss of surrounding habitat and ongoing impacts from increased recreational pressure and from ALAN. The development will also reduce habitat connectivity in the wider landscape with potential impacts to designated sites.

Buglife urges Wiltshire Council to refuse this application.

Please do not hesitate to contact us if further information is needed on any of the points raised and Buglife request to be kept updated on this application.

Yours sincerely



Gemma Waters

Saving Sites Office

⁴ https://cdn.buglife.org.uk/2019/08/A-Review-of-the-Impact-of-Artificial-Light-on-Invertebrates-docx_0.pdf