

12 August 2026

Wiltshire Council Planning

By email only to: steven.sims@wiltshire.gov.uk; developmentmanagement@wiltshire.gov.uk

Dear Mr 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.

Plantlife, as the UK conservation charity that speaks up for wild plants and fungi, objects to this application, as we did to application 20/07214/REM in 2021.

Our concerns for the loss or damage to the rare, acid grassland on the site are supported by the site's Environmental Impact Assessment; "4.7 -*This habitat meets the definition of Priority Habitat Lowland Dry Acid Grassland*". Further, it is our belief that the acid grassland may meet the definition of Irreplaceable Habitats within National Planning Policy Framework¹ (NPPF, 193.c), where development that harms Irreplaceable Habitats should be refused: "*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*". Lowland dry acid grassland is also listed as Section 41 Habitat of Principal Importance in England under the Natural Environment and Rural Communities (NERC) Act 2006.

The site is an important connection between Smallbrook Meadows Nature Reserve (adjacent to the northern boundary), the River Wylfe (River Avon System SSSI), the River Avon SAC, the River Wylfe Nature Reserve (to the east) and the wider Cranbourne Chase National Landscape. It has been identified as having a rich, diverse assemblage of wild plant and fungi species, and is an important B-Line site (insect/pollinator corridor, identified by the charity Buglife). These points support previous comments by Wiltshire Wildlife Trust, Natural England and other consultees.

The ground water on the site is already extremely vulnerable to disruption. Our view is that this development would put further stress on the natural environment, particularly as a result of run-off, both during construction and when the development is occupied, into the water table and ecologically sensitive river courses.

In the last century, the majority of England's priority habitat grasslands have been destroyed², with only fragments remaining. Wiltshire and Swindon's Local Nature Recovery Strategy (LNRS) recognises the localised decline in acid grasslands; "*Historic records suggest a decline from 50*

¹ https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

² <https://www.plantlife.org.uk/wp-content/uploads/2023/07/Plantlife-report-1-Status-Trends-and-Definitions-of-UK-Grasslands.pdf>

ha of acid grassland ([xxi](#)), highlighting the need for targeted conservation.

Together, these grassland types form a vital part of Wiltshire's ecological identity.” ³ The LNRS also includes specific measures to 'maintain and enhance' acid grassland. Refusing this development would help the Local Council deliver the ambition within its LNRS and its Biodiversity Duty. **We therefore urge the council to refuse this application.**

Yours sincerely,

Jenny Hawley

Policy and Advocacy Manager

³ <https://www.wiltshire.gov.uk/local-nature-recovery-strategy>