

Response to Planning Application PL/2026/03045 Damask Way, Warminster

Representation from the Wiltshire and Swindon Local Nature Recovery Strategy

As the lead officer responsible for delivery of the Wiltshire and Swindon Local Nature Recovery Strategy (LNRS), I wish to submit the following representation on the nature recovery implications of this proposal.

The LNRS is an adopted statutory strategy prepared under the Environment Act 2021. It provides the most up-to-date strategic evidence base for nature recovery across Wiltshire and Swindon, including areas of existing biodiversity importance, ecological connectivity and future nature recovery opportunity.

In considering this application, significant weight should be given to the LNRS evidence and priorities, particularly where they relate to ecological networks, habitat connectivity, climate resilience and opportunities for long-term nature recovery.

1. Strategic LNRS significance of the site

The site lies within an identified LNRS opportunity area and contributes to a wider ecological network with potential for habitat creation, woodland enhancement and nature recovery. The LNRS identifies this area as having particular potential to support mixed habitats, bats and wider ecological connectivity.

The site should not be viewed as an isolated field. It forms part of a landscape identified through the LNRS as having strategic value for nature recovery. Development would permanently reduce the capacity of this area to deliver habitat creation, ecological connectivity and landscape-scale restoration.

2. Relationship with designated sites, water quality and catchment function

The site's significance cannot be understood solely through the red-line boundary. It forms part of a wider ecological and hydrological network associated with Smallbrook Meadows, the River Wylfe and the River Avon SAC/SSSI. The site lies immediately adjacent to Smallbrook Meadows and approximately 80 metres from the River Avon SAC/SSSI.

Natural England has noted:

"The proposed development site sits on high ground with poor drainage, steep slopes and in close proximity to the River Wylfe. It is therefore likely that the development will pose a high risk to designated watercourses from diffuse pollution."

Given this sensitive context, biodiversity gains delivered within the site boundary may not fully offset adverse impacts on adjacent habitats, ecological processes, water quality and wider nature recovery opportunities. The site also performs important

catchment functions by supporting infiltration, reducing surface water runoff and contributing to the resilience of the wider river system.

3. Habitat mosaic, priority habitat and ecological network function

The site contains an unusually diverse mosaic of habitats, including Priority Habitat Lowland Dry Acid Grassland, Priority Habitat Lowland Mixed Deciduous Woodland, other neutral grassland, scrub, bracken and woodland edge habitats. This diversity means the site functions as more than a simple greenfield parcel; it forms part of a complex ecological matrix linking woodland, grassland, wetland and river habitats.

Lowland Dry Acid Grassland is both a Priority Habitat and an uncommon habitat within Wiltshire. Disturbance or degradation of this habitat could have a disproportionately high ecological impact relative to its size, particularly given its contribution to specialist invertebrate assemblages and the wider habitat mosaic.

Although the LNRS mapping does not identify every habitat present on the site, this reflects the strategic scale of the LNRS rather than an absence of ecological value. Site-specific ecological evidence should therefore be considered alongside the LNRS when assessing the site's nature recovery role.

The presence of this habitat diversity would significantly influence how the site is assessed from a nature recovery perspective. Rather than representing a simple habitat creation opportunity, the site functions as a complex ecological mosaic that contributes to wider ecological connectivity and supports a range of species and habitat types that should be conserved and enhanced.

4. Species connectivity: bats and amphibians

The site appears to function as part of a wider bat landscape. Surveys have recorded multiple bat species associated with the site and surrounding habitats, including greater horseshoe bat, lesser horseshoe bat, barbastelle, *Myotis* species and pipistrelle species. The surrounding river corridors, woodland, grasslands and hedgerows collectively form an important network for foraging and movement.

The site also forms part of a recognised amphibian movement corridor between habitats associated with Smallbrook Meadows and the surrounding landscape. Survey work identifies significant common toad populations in the area and an established migration route crossing the landscape around the site. Further fragmentation of these ecological connections could undermine local species populations and associated nature recovery objectives. Although common toad is not one of the mapped LNRS priority species, it is included on the Wiltshire Critical Species List compiled by WSBRC and was considered through the LNRS species prioritisation process.

5. Climate resilience, ecosystem services and access to nature

The LNRS seeks to establish resilient ecological networks capable of supporting species adaptation in response to climate change. The site's location between the River Wylye corridor, Smallbrook Meadows and surrounding habitats means it contributes to habitat connectivity, water regulation, natural flood management, pollinator support and wider ecosystem resilience.

The site is also crossed by well-used public rights of way and provides local people with access to a wildlife-rich landscape immediately adjacent to Warminster. Development may retain public routes, but it would substantially alter the experience of moving through a biodiverse and undeveloped landscape.

The protection and enhancement of such landscapes supports both nature recovery and climate adaptation, while also strengthening people's connection with the natural environment.

6. Biodiversity Net Gain, ecological uncertainty and limits of mitigation

I am concerned that the biodiversity value and nature recovery role of the site may not be fully captured through on-site habitat unit calculations alone. The site contributes to wider ecological connectivity, species movement, water regulation and the functioning of adjacent habitats and designated sites. These wider effects may not be fully reflected within Biodiversity Net Gain metrics focused on the development boundary.

There also remains significant ecological uncertainty. Wiltshire Council Ecology and Natural England have identified outstanding concerns relating to habitat classification, bat use of the site, invertebrates, amphibians, drainage, pollution pathways and impacts on adjacent designated sites. Given the site's strategic LNRS role and its proximity to designated wildlife sites, a precautionary approach should be applied.

7. Nature Recovery Network and planning weight

Paragraph 192 of the National Planning Policy Framework requires plans to identify, map and safeguard wildlife-rich habitats and wider ecological networks, and recognises the role of Nature Recovery Networks in supporting biodiversity recovery.

For these reasons, and on LNRS and nature recovery grounds, I recommend that significant weight is given to the concerns set out above and that the application is not supported in its current form.