

ECOLOGY RESPONSE NOTE

Miller Homes

Land at Marlborough Road, Royal Wotton Bassett

22.07.2026

1.0 INTRODUCTION

- 1.1 The following Response Note has been prepared by FPCR Environment & Design Ltd., on behalf of Miller Homes, in relation to the application for the approval of reserved matters (ref: PL/2026/02895), following outline permission granted by Wiltshire Council in December 2025 (PL/2024/08724).
- 1.2 This Response Note has been prepared in response to the Ecology Consultation Response issued by Wiltshire Council, addressing the request for further information. Section 2.0 sets out each of the matters raised by the Council, together with a response and supporting clarification.
- 1.3 The responses prepared by FPCR make reference to the following supporting documents, which have been prepared or are currently being finalised to accompany the Reserved Matters application:
- Landscape and Ecological Management Plan (LEMP)
 - Construction and Ecological Management Plan (CEMP)
 - Biodiversity Net Gain Metric and Report (BNG)
 - Habitat Management and Monitoring Plan (HMMP)
- 1.4 FPCR Environment & Design is a multi-disciplinary environmental and design consultancy established over 60 years, with expertise in architecture, landscape, ecology, arboriculture, urban design, masterplanning and environmental impact assessment. The practice is a member of the Landscape Institute and Institute of Environmental Management and Assessment and is frequently called upon to provide expert evidence on landscape and visual issues at Public and Local Plan Inquiries.

Proposed Development

- 1.5 The proposed development comprises an application for the demolition and clearance of existing structures and the development of up to 95 dwellings, with associated car parking, open space, landscaping, drainage and other associated infrastructure.

Baseline

- 1.6 The site is approx. 6.78ha and comprises mostly temporary grass and clover ley habitat over three field compartments, with small areas of scrub, woodland and other linear features including hedgerows, tree lines and a watercourse. Site access is gained from Marlborough Road on the north eastern boundary.

2.0 RESPONSE

- 2.1 The Wiltshire Council Planning Consultation Response (Ecology) raised an objection pending the submission of further information. At the time the consultation response was prepared, the supporting documentation included the Landscape Strategy Plan, Arboricultural Assessment and Method Statement, and the Section 38 & Street Lighting Plan. The BNG Assessment and Metric, LEMP, HMMP, CEMP and Sensitive Lighting Strategy had not yet been submitted. These documents provide additional information relating to habitat retention and creation, long-term habitat management, Biodiversity Net Gain and ecological mitigation, and address the matters raised within the consultation response. Accordingly, they are referenced throughout the responses provided below.

"The vegetation link previously proposed along the northern boundary appears to have been removed, resulting in a reduction in east-west habitat connectivity across the site."

- 2.2 The updated Landscape Strategy Plan retains and enhances habitat connectivity through the retention of existing and creation of new native hedgerows, native scrub planting and species-rich grassland corridors. Whilst not delivered as part of this application, a new native hedgerow is being established immediately adjacent to the northern site boundary as part of the approved Templers Way development (Ref. PL/2023/07556), in accordance with the approved plans. Notwithstanding this, the retention and enhancement of hedgerows within the application site, together with the addition of a new native species-rich hedgerow within the ecological enhancement area, provides further habitat connectivity across the site, creating additional commuting, foraging and nesting opportunities for wildlife.

"Plot 29 appears to encroach into the centrally located habitat corridor identified for retention. This would require the removal of existing vegetation and may adversely affect foraging and commuting opportunities for bats. The retention of this corridor should be demonstrated."

- 2.3 Plot 29 is situated on a private drive which will not be subject to street lighting. The ecological functionality of this corridor, including bat commuting opportunities, is supported by the long-term management of the hedgerow and edge habitats within the LEMP.

"The provision of additional parking adjacent to the allotments appears to have increased the width of the road corridor, resulting in a reduction in the extent of vegetation previously proposed."

- 2.4 The revised Landscape Strategy Plan includes native hedgerow, tree planting and species-rich grassland around the allotments and road corridor. The overall habitat provision and biodiversity enhancements are assessed within the accompanying BNG Assessment and are in excess of the mandatory 10% net gain in habitats and linear habitats categories.

"The orchard has been relocated and appears to be reduced in size compared to the approved outline proposals. In addition, the proposed vegetation within this area differs from that previously presented. Clarification is required regarding these changes and their ecological implications."

- 2.5 The orchard has been revised as part of the updated landscape proposals. Whilst its overall extent has not changed significantly, it has been relocated beyond the SuDS basin in the south-central corner of the site. This location will allow for a more relaxed grassland management

regime, creating greater structural diversity within the grassland and providing enhanced ecological benefits through its proximity to existing mature hedgerows, thereby improving habitat connectivity and foraging opportunities for wildlife. The Landscape Strategy Plan and LEMP secure long-term management for the proposed planting.

"The proposed pumping station appears to be located substantially closer to the boundary feature than previously indicated. Given the presence of a watercourse along this boundary, it must be demonstrated that the structure is located outside the riparian zone and that there are no implications for Biodiversity Net Gain calculations."

- 2.6 The revised layout confirms the pumping station location. The BNG Assessment has been prepared using the final layout and demonstrates that there are no adverse implications to watercourses as the location falls outside of the 10m riparian zone and is therefore not included in the water courses category.

"Amendments to the road layout appear to have increased the extent of removal of the central hedgerow. Clarification is required regarding these changes and their ecological implications."

- 2.7 The extent of hedgerow retention, removal and replacement is shown on the updated Landscape Strategy Plan. Replacement native hedgerow planting and long-term management are secured through the LEMP and HMMP, with the overall biodiversity effects accounted for within the BNG Assessment.

"The Arboricultural Assessment identifies the removal of an additional section of the central hedgerow that was not previously proposed for loss. Further justification and assessment of the ecological impacts are required."

- 2.8 With reference to the Tree Retention Plan (FPCR Rev B, 2026) and accompanying Tree Schedule, H1 is a species rich native outgrown hedgerow. To facilitate construction of the spine road connecting the two parcels of development, additional widening of the existing field access at this point was required, along with trimming of the hedgerow to allow the provision of footpaths and trim trail play equipment. The updated landscape proposals include replacement native hedgerow planting and enhancement throughout the site. Hedgerow losses are quantified and compensated for through the accompanying BNG Assessment, with future management secured through the LEMP.

"Clarification is required regarding the extent of habitat loss associated with the proposed cellular storage areas and how this has been accounted for within the ecological proposals. Parking provision associated with Plot 45 appears to encroach into an area of existing habitat that would require removal, contrary to the habitat retention strategy approved at outline stage."

- 2.9 The cellular storage areas have been incorporated into the final habitat design and have been accounted for within the BNG Assessment. Habitat creation proposals above these areas are secured through the Landscape Strategy Plan and LEMP.

"The arboricultural information indicates that a substantial section of the western boundary vegetation requires removal. No details have been provided regarding replacement planting or habitat compensation measures. This information should be submitted."

- 2.10 With reference to the Tree Retention Plan (FPCR Rev B, 2026) and accompanying Tree Schedule, Group G2 comprises a number of standing dead elm *Ulmus procera* within an existing native hedgerow that have been recommended for removal on arboricultural grounds. The hedgerow itself, comprising predominantly field maple and hawthorn with several mature hawthorn trees, will be retained. Its long-term protection and management are secured through the LEMP and future HMMP, ensuring the feature continues to provide effective landscape screening and ecological connectivity around the site.

"The introduction of an additional hedgerow within the biodiversity enhancement area is welcomed; however, no justification has been provided for its inclusion, nor has the rationale for its proposed location been explained. Further details should therefore be submitted."

- 2.11 As a result of hedgerow losses required to facilitate the site access, additional native species-rich hedgerow planting has been incorporated within the ecological enhancement area to achieve the required 10% Biodiversity Net Gain for linear habitats. Whilst it is acknowledged that this hedgerow does not follow a historic field boundary, it has been intentionally located to increase habitat diversity, strengthen habitat connectivity across the site and, once established, provide enhanced commuting, nesting and foraging opportunities for wildlife, together with valuable edge habitat for reptiles and amphibians. Its establishment and long-term management are secured through the LEMP, with its contribution to biodiversity net gain demonstrated within the accompanying BNG Assessment.

3.0 CONCLUSION

- 3.1 The Reserved Matters proposals have been reviewed against the approved outline ecological strategy, with the amendments to the layout, landscape proposals and supporting ecological information considered in the context of habitat retention, enhancement and Biodiversity Net Gain. The responses set out within this note demonstrate that, whilst there have been refinements to the detailed layout and landscape design, the scheme continues to retain the key ecological features identified at outline stage wherever practicable, whilst incorporating additional habitat creation and enhancement to maintain and strengthen ecological connectivity across the site.
- 3.2 The revised Biodiversity Net Gain Assessment confirms that the development continues to achieve the statutory requirement for a minimum 10% Biodiversity Net Gain, including within the linear habitat category. Together with the accompanying LEMP, HMMP, Sensitive Lighting Strategy, these documents detail how retained habitats will be appropriately protected and managed in the long term, newly created habitats will be successfully established, and any habitat losses associated with the detailed design have been appropriately compensated.
- 3.3 Overall, it is considered that the Reserved Matters proposals remain consistent with the ecological principles established through the outline permission. The revised landscape proposals retain and enhance the site's ecological function through the provision of connected native hedgerows, species-rich grassland, native scrub, orchard planting and sensitive lighting measures, ensuring that opportunities for wildlife movement, foraging and nesting are maintained and enhanced. The proposed management measures secured through the LEMP and future HMMP will ensure these habitats continue to develop and deliver their intended biodiversity benefits throughout the lifetime of the development.

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