

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name: Mary Holmes MCIEEM

Date: 10/09/2026

Application No: PL/2026/02717

Proposal: Full planning permission for residential development (Use Class C3) comprising 135 dwellings with associated private amenity space and car/cycle parking, a comprehensive landscaping scheme to include publicly accessible amenity space, sustainable drainage features, new tree planting and associated works. Alterations to the existing Home Farm access from Boreham Road, including demolition of a section of boundary wall, and new vehicular, cycle and pedestrian routes through the site. All associated infrastructure works.

Site Address: Land at Home Farm, Boreham Road Warminster

Case Officer: Russell Brown

Recommendations:

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

Further information – see below for more details

	Issue	Policy / Legislative compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Bats	Habs Regs	10/09/2026. EclA to add detail on important greater horseshoe bat roost at Boreham Grange (within 50m). Stand-alone plan to be submitted showing potential/recorded bat commuting routes across the site, either on a dedicated Bat Mitigation Plan or as part of the Biodiversity Mitigation and Enhancement Plan (see below under Biodiversity Mitigation and Enhancement Plan). Buffer distances and dark corridors to be shown. Details below.	
2	Bats	NPPF; CP 50. Habs Regs.	10/09/2026. Lighting Strategy to demonstrate dark buffers/corridors can be maintained across the site. Further info. below.	
3	River Avon SAC	Habs Regs	10/09/2026. A completed calculation in an unlocked Excel file (using the latest version of the calculator).	

4	Biodiversity Net Gain	Environment Act 2021.	10/09/2026. Veteran trees are present within the site boundary so they should be identified and accounted for within the metric process as irreplaceable habitat.	
---	-----------------------	-----------------------	---	--

The outstanding document(s)/information 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.

Matters Considered:

Thank you for consulting me on the above application in relation to ecology. I have reviewed the submitted information as listed below against mapping (OS and aerial) along with photographs of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

Ecological Impact Assessment. (EPR, 20th April 2026).
Statutory Biodiversity Metric Gain Condition Assessments
Landscape Masterplan. Drwg. No. P22-1991_EN_05_B1. (Pegasus Group Ltd, 09/03/2026).
Nutrient Neutrality Statement (Ardent Consulting Engineers, March 2026).
Design & Access Statement. (Pegasus Group Ltd, April 2026).
Statutory Biodiversity Metric. Completed by Alison Hogan (no date).
Biodiversity Net Gain (report). (EPR, 20 April 2026).
Arboricultural Impact Assessment. (Aspect Arboriculture, March 2026).

Location/Context

The proposed development site is located on the eastern edge of Warminster. Surrounding habitats comprise a connected network of agricultural land, native hedgerows, mature trees, woodland and parkland. Bishopstrow House and parkland lies immediately to the east, whilst Boreham Grange and associated woodland habitats are located to the west. The River Avon SSSI/SAC including the River Wylfe corridor which supports an extensive network of riparian/wetland/woodland is c. 85m south. The proposed site also lies within the wider landscape influenced by Salisbury Plain SAC/SPA, with Battlesbury Hill to the north-west (c. 1.5-2km).

Habitats

The proposed development site comprises arable grassland (3 fields of temporary grass and clover leys), small areas of modified grassland, and other neutral grassland (one small area and one larger area that will be retained). Field margins support areas of tall ruderal vegetation and bramble scrub. The EcIA concludes that these grassland habitats are of relatively low ecological value and are important principally at the zone of influence level, although they provide supporting habitat for breeding birds, reptiles and foraging bats.

Ponds and Great Crested Newts

The nearest pond was identified as being approximately 85m south of the site and could not be surveyed due to access constraints and therefore its suitability for great crested newts has not been confirmed. Any risk to great crested newts, and other amphibians, including common toad/frogs and common newts can be appropriately managed through the implementation of a Construction Ecological Management Plan (CEcMP) incorporating a precautionary methodology. This should include a Toolbox Talk together with reasonable avoidance measures during vegetation clearance, groundworks and construction activities.

Hedgerows

The proposed development site supports a number of mature native hedgerows, including species-rich ones that may qualify as Important Hedgerows under the Hedgerow Regulations 1997. The most

ecologically valuable hedgerows include those supporting veteran trees and are retained within the proposals. Hedgerow losses are limited to small breaches required for access and connectivity, with replacement species-rich hedgerow planting proposed to deliver an overall net gain in hedgerow habitat.

Badger

No evidence of badger setts was recorded during any of the surveys carried out. This species is likely to periodically visit the proposed development site for foraging purposes.

Bats (Foraging and Commuting)

Overall, the site supports a bat assemblage of regional importance. Species included Annex II species greater and lesser horseshoe, and Barbastelle. These species were recorded during static detector surveys, confirming that the site forms part of the wider habitat network used by bats of European conservation importance.

Bat activity was concentrated along the site's hedgerows, mature trees and woodland-edge habitats, with relatively limited activity recorded within the open grassland fields. However, it should be noted that parts of the site comprised permanent and cattle-grazed pasture during the 2025 surveys, providing potentially suitable foraging habitat for greater horseshoe bats.

Despite the generally low ecological value of the improved grassland habitats, static surveys recorded 40 passes of greater horseshoe bat across the two detector locations, indicating regular use of the site by this species and this is only likely to represent a small proportion of the level of activity, due to the highly directional nature of horseshoe bat echolocation calls.

The EclA acknowledges that the wider landscape, comprising hedgerows, grazed pasture, woodland and parkland habitats, provides optimal habitat for horseshoe bats. Whilst the application site itself is dominated by arable land and improved grassland of relatively low ecological value, it supports mature hedgerows, mature trees and veteran trees that provide important commuting and foraging habitat within a connected landscape that includes Boreham Grange, Bishopstrow House and the River Wylye corridor.

The Council has subsequently been informed of a confirmed greater horseshoe bat roost at Boreham Grange, approximately 50m from the site. This detail has now also been confirmed by the County Bat Recorder. The greater horseshoe roost is important as a hibernation site, summer roost and mating site, with small numbers of bats gathering at the roost in the autumn. Lesser horseshoe bats also hibernate at Boreham Grange. This information has not been considered within the submitted EclA and should be incorporated into an updated EclA; an assessment of potential effects on commuting routes, foraging habitat and wider habitat connectivity. Moreover, taking the close proximity of this important greater horseshoe roost into consideration, the retention and enhancement of hedgerows, veteran and mature trees and dark corridors is likely to be important in maintaining the ecological functionality of the wider habitat network used by greater horseshoe bats. Potential/recorded bat commuting routes should be identified on a site layout plan, either through a dedicated Bat Mitigation Plan or as part of the Biodiversity Mitigation and Enhancement Plan (see below under Biodiversity Mitigation and Enhancement Plan). The plan must clearly show dark buffer zones and their dimensions, to demonstrate how habitat connectivity and site permeability for horseshoe bats will be maintained. Particular consideration should be given to the eastern site boundary and connectivity between this boundary and the confirmed greater horseshoe bat roost at Boreham Grange. This information is required to demonstrate that sufficient space has been incorporated within the layout to accommodate these measures and ensure their long-term functionality.

A lighting strategy should also be submitted to demonstrate that suitable dark corridors can be maintained for Annex II bat species, including greater horseshoe bat and lesser horseshoe bat, within the proposed site layout. The strategy should identify predicted light spill levels across key commuting routes, retained hedgerows, veteran and mature trees and habitat buffers, and demonstrate that lighting has been designed to avoid adverse effects on bat movement and habitat connectivity.

As a result of the significance of this roost within Boreham Grange, the retention, enhancement and long-term management of habitat connectivity through the site is likely to be important in maintaining landscape permeability and ecological functionality for greater horseshoe bats. In particular, the north-eastern boundary forms a continuous belt of mature trees linking Battlesbury Hill with the River Wylfe and is likely to function as an important habitat connectivity feature within the wider landscape. In addition, Battlesbury Hill has recorded greater horseshoe bat activity, including an individual ringed at Box Mine, while the River Wylfe supports extensive pasture and riparian habitats likely to provide valuable foraging opportunities. Given the dependence of greater horseshoe bats on connected, dark and well-vegetated landscapes, this corridor is likely to facilitate movement between roosting and foraging habitats and should therefore be retained, protected and enhanced to maintain ecological connectivity across the landscape. The importance of this boundary as a wildlife corridor is also recognised within the Local Plan Review and Warminster Neighbourhood Plan Evidence Base.

With respect to the confirmed presence of greater horseshoe bats within the site and an important roost at Boreham Grange, and the record of a greater horseshoe bat ringed at Box Mine SSSI (a component of the Bath and Bradford-on-Avon Bats SAC) at Battlesbury Hill, it is assumed that the proposed site/boundary features contribute to the ecological network used by functionally linked greater horseshoe bats, and therefore the application must be considered under the Habitat Regulations.

Bats and Trees

One mature tree will be lost to development and compensated through native tree planting.

Ground Level Tree Assessments identified one tree within the proposed site and several adjacent off-site trees with moderate bat roost potential (PRF-M), together with a number of trees containing lower suitability roost features. All trees with potential roost features should be marked on the Construction Ecological Management Plan to be secured via planning condition. Please note all trees numbers should correspond with the tree numbers used during the arb assessment.

All four veteran ash trees will be retained. Regular management of the veteran trees will need to be specified in the HMMP to safeguard this important resource. Tree loss is limited to the removal of a single mature Ash tree (T15), which is proposed to be compensated through native tree planting.

Reptiles

The reptile surveys recorded grass snake, common lizard and slow-worm within field margins and boundary habitats across the proposed development site. Although all three widespread reptile species were recorded, population levels were assessed as low. However, the assemblage was detailed in the EciA as a Key Reptile Site and was evaluated as being of Local-District importance.

The proposed development would result in the loss of some reptile. Mitigation measures detailed in the EciA include a Reptile Mitigation Strategy including seasonal vegetation clearance, retention and protection of suitable habitat, phased habitat manipulation, supervised destructive searches and relocation of any reptiles encountered to retained habitat within the Site. In terms of enhancement proposals include habitat creation and enhancement measures within retained boundary habitats and public open space which would increase habitat availability and connectivity overall for reptiles. .

Biodiversity Mitigation and Enhancement Plan

As we require a plan identifying existing and proposed commuting horseshoe bat corridors to fully assess the potential impacts on Annex II bats, in particular greater horseshoe (as detailed above), it is recommended that this information is included within the Biodiversity Mitigation and Enhancement Plan (as a standalone plan) and submitted provided prior to determination. For clarity and consistency, in addition to the above, all ecological mitigation and enhancement measures should be shown on the same plan. This should also include reptile mitigation areas, bird and bat enhancement features, and hedgehog highways.

The Biodiversity Mitigation and Enhancement Plan should also identify the location of integrated bird and bat features at a minimum ratio of one feature per dwelling, together with the provision of hedgehog highways throughout the development. Details should include the type, specification, number, height, elevation and location of each feature, including bat bricks/tubes, swift bricks, sparrow terraces and other integrated nesting or roosting features. This will ensure that the proposed mitigation and enhancement measures can be fully assessed and appropriately secured through the planning process.

Habitat Regulations Assessments

River Avon SAC (Hampshire Catchment)

All applications must submit a completed calculation as an unlocked Excel file for the Council's ecologist to approve. This requirement was clearly set out in the preapp response (dated 27/04/2026). The approved calculation is required as part of the Appropriate Assessment, which must be completed, and the conclusion agreed with Natural England prior to the application being determined.

Please note: it is stated in submitted Nutrient Neutrality Statement, that the applicant is considering purchasing Council-issued phosphorus credits, and while these are currently available in this catchment, to ensure that adequate mitigation is secured and deliverable for this development, the necessary credits must be secured as part of the permission. Where Council mitigation is secured with the permission, a strategic AA has been prepared for qualifying planning applications for residential (and non-residential development), within sewered and non-sewered areas of the River Avon SAC catchment.

However, if the applicant wishes to use third-party credits, or on-site mitigation, a bespoke AA will need to be completed by the LPA.

Salisbury Plain 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 strategic AA for Salisbury Plain SPA continues to be supported by NE until end of December 2026.

Bath & Bradford-on-Avon Bats SAC

A test of likely significance needs to be carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) to assess potential likely significant effects on the Bath & Bradford-on-Avon Bats SAC.

Further information is required as detailed in this response to enable the LPA to complete this (see under 'Bats (Foraging and Commuting)' above).

Biodiversity Net Gain

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 completed Statutory Biodiversity Metric. Completed by Alison Hogan (no date) confirming the baseline and predicted post- development biodiversity units of the site has been submitted.

The following issues must be addressed in the baseline prior to determination:

- veteran trees are located within the site boundary and are considered irreplaceable habitat.

If veteran trees are present within the site boundary, they should be identified and accounted for within the metric process as irreplaceable habitat.

Please clarify and provide further information.

I will review the metric and associated BNG report once this information has been provided.

Planning Conditions to include:

Detailed Reptile Mitigation Strategy

Construction Ecological Management Plan

Final sign off – all matters addressed:

Ecologist	Date