

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	22/09/2026
Application Number:	PL/2025/09907
Proposal:	Reserved Matters (scale, layout, external appearance and landscaping) for 9 No. dwellings and associated vehicular access, pursuant to Condition 2 of outline approval (ref. PL/2021/10503)
Site Address:	Brick Hill Farm, 48 Bath Road, Warminster, BA12 8PF
Case Officer:	Julie Mitchell

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Ecological Impact Assessment (EcIA): Mitigation and Enhancement for Protected Species	NPPF, CP50, Habs Regs	22/09/2026 The proposed site layout does not accord with the approved Parameters Plan (DWG: 4161-BB-XX-XXX-DR-A-SK03 Rev A) secured under outline permission PL/2021/10503. An amended layout should be submitted demonstrating compliance with the approved Parameters Plan, including the retention of the 5m hedgerow buffer zones and the Wildlife Enhancement Zone as distinct, managed ecological features outside the residential curtilage.	NO

The outstanding document(s) 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.

Please Note: When resubmitting a revised document, **ALL** changes must be highlighted to enable review.

Thank you for your consultation on the above application. I have reviewed the submitted documents against OS maps, aerial photographs of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Wiltshire Council Planning Consultation Response Ecology. PL/2026/00358. 12 June 2026;
- Wiltshire Council Planning Consultation Response Ecology. PL/2021/10503. 27 September 2024;
- Parameters Plan. 30 January 2023. Boon Brown. Drawing No. 4161-BB-XX-XXX-DR-A-SK03. Rev. A: *secured at outline permission under Wiltshire Council planning reference PL/2021/10503*;
- Ecological Assessment. November 2021. Greenwood Ecology & Countryside Management: *provided at outline permission under Wiltshire Council planning reference PL/2021/10503*;
- Landscape Ecological Management Plan (LEMP). May 2026. Encompass Ecology Ltd;
- Construction Environmental Management Plan (CEMP): Biodiversity. May 2026. Encompass Ecology Ltd;
- Shadow Habitats and Regulations Assessment (SHRA). 11 May 2026. Enviren. Ref. 2500357-ENV-S1-SW-TR-E-0002;
- Natural England Nutrient Neutrality budget calculator for the River Avon SAC. Calculator_Brick Hill Farm;
- Reserved Matters Drainage Statement. 26 August 2026. Transport Planning. IMA-20-058. Report No. DS 1-7;
- Landscape Design. April 2026. Clark Landscape Design. Drawing No. CLD 943. RevC;
- Landscape Proposals, Planting Schedule and Specification. November 2025. Clark landscape Design;
- Arboricultural Impact Assessment – Addendum. November 2025. Clark Landscape Design;
- Tree Protection Plan. November 2025. Clark Landscape Design. Drawing No. CLD 943B;
- Proposed Site Plan. 23 September 2024. Big Picture Design. Drawing No. 13270/002. Rev. D;
- Proposed Site Plan (Parameters Plan & RPZ Overlay). 23 September 2024. Big Picture Design. Drawing No. 13270/002. Rev. C.

We note the information submitted is in support of Condition 2 of the reserved matters application for outline application PL/2021/10503. The submitted documents were reviewed against the Parameters Plan (30 January 2023. Boon Brown. Drawing No. 4161-BB-XX-XXX-DR-A-SK03. Rev. A) approved and secured at outline.

The previous ecology consultation response dated 02/03/2026 was based on the understanding that the approved 5m hedgerow buffer zones identified on the approved Parameters Plan (30 January 2023, Boon Brown, Drawing No. 4161-BB-XX-XXX-DR-A-SK03 Rev. A) would be retained as separate ecological features in accordance with the ecological mitigation and enhancement strategy secured by condition under outline permission PL/2021/10503. The submitted layout does not clearly show the relationship between residential curtilages, the extent of the proposed garden boundaries and the approved buffer zones. Following clarification from the Case Officer, it is now understood that the Proposed Site Plan (23 September 2024, Big Picture Design, Drawing No. 13270/002 Rev. D) does not retain the approved 5m buffers along the eastern and western hedgerows and that the rear garden boundaries of Plots 1, 2, 3, 7, 8 and 9 extend to the red line boundary.

The Parameters Plan is an ‘approved document’ of the outline permission granted and the reserved matters application must be in compliance with the plan. The current proposal conflicts with Core Policy 50 of the adopted Wiltshire Core Strategy 2015 and Chapter 19 sections N2 and N6 of the National Planning Policy Framework August 2026, as the mitigation previously secured has not been adhered to within the reserved matters application proposal.

The ecological assessment undertaken by Greenwood Ecology & Countryside Management (November 2021) identified the eastern and western boundary hedgerows as the principal ecological features on site due to their value for protected species, particularly commuting and foraging bats. The outline mitigation strategy was designed around the retention and protection of these habitats through the provision of 5m hedgerow buffer zones and a Wildlife Enhancement Zone, both of which were incorporated into the approved Parameters Plan. These measures were intended to protect retained hedgerows from residential impacts, maintain habitat connectivity, support bat commuting and foraging routes, provide protected species mitigation and deliver biodiversity enhancements in accordance with Core Policy 50.

The Parameters Plan identifies the hedgerow buffers as areas that would be 'allowed to mature for two years following construction and thereafter managed on a three-year rotation to provide a naturalised margin between the development and retained hedgerows'. The incorporation of the approved buffer zones into private residential curtilage is contrary to the mitigation strategy secured through the outline permission and undermines the ecological assessment upon which the acceptability of the development was determined. As a result, it has not been demonstrated that the approved ecological function, management objectives and biodiversity benefits associated with these buffers can be delivered or maintained in compliance with the approved mitigation strategy.

The layout must be amended to demonstrate compliance with the approved Parameters Plan (30 January 2023, Boon Brown, Drawing No. 4161-BB-XX-XXX-DR-A-SK03 Rev. A), including the retention of the approved 5m hedgerow buffer zones as separate, managed ecological features outside of private residential curtilage. In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected habitats or species. The information outlined above must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application.

Lighting

The Proposed Site Plan identifies the hedgerow buffer zones as "5m low light level buffers". The lighting information submitted in support of the outline application states that retained bat habitat, including perimeter trees, scrub and hedgerows, should be maintained at illumination levels of no more than 0.5 lux, with the lighting designed in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals. Whilst the detailed lighting scheme will be addressed through condition 14 of outline permission PL/2021/10503, the Reserved Matters layout must accord with the approved lighting strategy.

CEMP and LEMP

It is acknowledged that the submitted Landscape Ecological Management Plan (LEMP) (May 2026. Encompass Ecology Ltd) and Construction Environmental Management Plan (CEMP): Biodiversity (May 2026. Encompass Ecology Ltd) have been provided as part of the Reserved Matters submission. Whilst these documents will be considered through a separate discharge of condition application, they are intended to implement the proposed layout and should therefore accord with the ecological mitigation and enhancement strategy secured through outline permission PL/2021/10503 and the approved Parameters Plan. The outline permission requires the CEMP to identify ecological protection areas and buffer zones together with the physical means of protection to be employed during construction. Whilst the LEMP includes proposals for hedgerow retention, enhancement planting and management of the northern ecological area, neither the LEMP nor the CEMP adequately reflect the approved hedgerow buffer zones. The CEMP proposes protective fencing only 1m from retained hedgerows, and the Ecological Risk Zone Plan and Protective Fencing Plan are based on this approach, which does not accord with the approved Parameters Plan. The ecological conditions attached to the outline permission remain applicable and any CEMP and LEMP should align with the approved Parameters Plan, landscape proposals, planting schedules and specification documents.

River Avon SAC Mitigation Scheme

It is acknowledged that the site lies within the catchment of the River Avon SAC and Condition 10 of the outline permission requires evidence of compliance with the Wiltshire Council River Avon Special Area of Conservation Mitigation Scheme, or an alternative approved mitigation package, to be submitted and approved prior to commencement of development. The discharge of Condition 10 is being considered through a separate application (PL/2026/00358). The nutrient neutrality mitigation strategy must align with the Reserved Matters proposals, including the approved layout, landscaping, land use, drainage infrastructure, SuDS features and surface water management arrangements. It is noted that the Ecology response to application PL/2026/00358 identified outstanding information requirements regarding the nutrient neutrality calculations and mitigation proposals, and also highlighted that the Proposed Site Plan departs from the approved Parameters Plan through changes to the SuDS layout and removal of the pumping station. As changes to attenuation and surface water management features will affect the approved nutrient mitigation strategy, the Reserved Matters proposals should demonstrate consistency with the River Avon SAC mitigation proposals and the approved Parameters Plan. The Ecology comments provided under application

PL/2026/00358 therefore remain applicable to this Reserved Matters application where they relate to layout, landscaping, drainage infrastructure, surface water management and the delivery of the required nutrient mitigation.

Final sign off – all matters addressed:

Ecologist	Date