

Ecology and Lgs Objection to Planning Application: PL/2026/02717

SITE: Land at Home Farm, Boreham Road, Warminster, BA12 9HF

PROPOSAL: Full residential development of 135 dwellings and associated infrastructure

OBJECTOR: Al Wright

DATE: 1st July 2026

1. Executive Summary

This report sets out a robust, policy-driven formal objection to full planning application **PL/2026/02717**. The proposal introduces severe, unmitigated ecological risks to an internationally designated habitat network, violating both local planning directives and the public mandate of the emerging **Warminster Neighbourhood Plan 2**.

Crucially, this application represents a direct, material breach of **Paragraph 187(e) of the National Planning Policy Framework (NPPF, December 2024)**, multiple **Wiltshire Core Strategy Policies**, and explicitly violates the emerging **Warminster Neighbourhood Plan Policy GBI 7**. The developer fails to assess construction-phase environmental impacts, ignores town-wide cumulative growth strain, and attempts to bypass statutory protections by offsetting physical nutrient pollution on paper via credit schemes without securing the future cleanliness of vital local headwaters.

2. Direct Breach of National Policy: NPPF Paragraph 187(e)

The application fundamentally conflicts with national planning directives. **NPPF Paragraph 187(e) (December 2024)** explicitly mandates that planning policies and decisions must contribute to and enhance the natural and local environment by:

"...preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans."

The Home Farm proposal breaches this national statutory requirement on multiple fronts:

A. Failure to Prevent Water and Soil Pollution (River Basin Management)

- **The Credit Safeguard Fallacy:** A long-standing environmental protection restriction existed on this site due to nutrient neutrality constraints. The developer has attempted to bypass this obstacle by purchasing "nutrient credits". However, buying paper credits does not physically stop pollution from reaching this specific geographic sector.
- **Threat to Vital Headwater Spawning Grounds:** No concrete, localized operational plans are in place to ensure the river adjacent to Home Farm stays clean. Because this site directly feeds the vital, sensitive headwaters and gravel spawning beds of the River Wylfe catchment, arbitrary credit schemes completely fail to satisfy **NPPF 187(e)**'s directive to physically "*improve local environmental conditions such as air and water quality*" or respect the relevant **River Basin Management Plans**. The physical ecosystem remains entirely at risk from localized agricultural-to-urban chemical shifts.

B. Severe Roadside Air and Noise Pollution Exposure

- **Hostile Mitigation Layout:** The developer's proposed public open space is a tokenistic patch tightly hemmed in and bordered on three sides by active roads.
- **Violation of Exposure Rules:** Placing the community's primary recreational asset in this location directly conflicts with NPPF 187(e) by "***putting new development at unacceptable risk from, or being adversely affected by, unacceptable levels of air or noise pollution.***" Instead of a safe, tranquil sanctuary, the community is being offered a polluted urban island exposed to constant vehicle emissions and traffic noise.

C. Hydrological Defects and Safety Hazards

- **Sodden, Unusable Topography:** Because this mitigation space is placed at the absolute lowest hydrological point of the site, it will act as a permanent drainage sink. For large portions of the year, the ground will be completely sodden and waterlogged, creating an unusable plot of swamp land.
- **Major Drowning Hazard:** To handle this structural water issue, the layout embeds a massive water retention/attenuation pond inside the token green space. Placing an unmonitored, deep-water basin adjacent to a residential play area introduces a severe, continuous **drowning hazard** to a space meant for family recreation, demonstrating a total failure to manage land stability and local water safety under national guidelines. The Hazard is increased by the sites isolation from

other dwellings meaning the pond is out of sight to most residents.

3. Violations of Local Development Plans and National Framework Alignment

To prove this objection is based on statutory requirements rather than personal opinion, the application is shown to breach the following local and national policy matrices:

A. Biodiversity and Habitat Severance

- **Local Policy: Wiltshire Core Policy 50 (Biodiversity and Geodiversity)** mandates that development must avoid damage to local ecological networks and habitats.
- **National Alignment (NPPF Paragraph 186(a)):** National policy dictates that if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or compensated for, then planning permission should be refused (p. 3). By fracturing the continuous land bridge from Battlesbury Hill SSSI to the River Wylde SAC, the proposal completely fails to safeguard critical habitat connectivity and undoes local agricultural conservation efforts (the bird and bee wildflower fields).

B. Destruction of Green Infrastructure

- **Local Policy: Wiltshire Core Policy 52 (Green Infrastructure)** states development will not be permitted if it results in the loss of green infrastructure or compromises its connectivity.
- **National Alignment (NPPF Paragraph 96(c) & Paragraph 181):** The NPPF requires plans to enable healthy lives through the provision of safe and accessible green infrastructure, taking a strategic approach to maintaining, enhancing, and strengthening networks of habitats (pp. 6, 28). Home Farm is the **final unblocked, viable green corridor** in the area. The developer's noisy, sodden, roadside mitigation plot actively compromises the network and will remove a well used footpath network through the countryside with five years of construction noise and pollution, and total loss once houses are built.

C. Substandard, Hazardous Design

- **Local Policy: Wiltshire Core Policy 57 (Ensuring High-Quality Design)** requires layouts to maximize public safety and protect amenity.
- **National Alignment (NPPF Paragraph 102(a) & Paragraph 135(f)):** NPPF Paragraph 135(f)

explicitly requires developments to create places that are safe, inclusive, and accessible, with a high standard of amenity, where hazards and the fear of danger do not undermine the quality of life (p. 40). Crucially, Paragraph 102(a) states: *"The safety of children and other vulnerable users in proximity to open water, railways and other potential hazards should be considered in planning and assessing proposals for development."* (p. 29) The structural incorporation of an open deep-water attenuation pond directly inside a restricted public play area represents a severe failure in safe design, and the railway line proximity is never mentioned.

4. Omission of Building Stage Impacts & Cumulative Town Growth

The application is procedurally and environmentally flawed under **Planning Practice Guidance (PPG)** standards due to a total lack of rigorous impact analysis:

- **Zero Assessment of Building Stage Impacts:** The applicant has submitted no dynamic assessment regarding the environmental impact of the heavy industrial building stage. The physical process of constructing 135 houses presents an unscrutinised threat to local soils, air quality, and runoff pathways.
- **Unexamined Town-Wide Cumulative Effects:** This application isolates Home Farm as an independent variable. It completely ignores the cumulative impact of numerous housing allocations expanding across Warminster, pushing the town's environmental carrying capacity beyond legal tolerances highlighted by the EA having to threaten prosecution to the developers at Bath road due to continuous large plumes of silt being discharged into the river system daily. This has already damaged the river system and created new silt banks all along the river corridor, effecting ecology and water movement.

5. Violation of Warminster Neighbourhood Plan Policy GBI 7

The application directly threatens the core strategy of Warminster's localized environmental framework by physically severing a legally recognized asset:

- **Destruction of the Strategic Corridor:** The emerging **Warminster Neighbourhood Plan 2** explicitly identifies and designates the **GBI 7 Battlesbury to Wylde Corridor** as a vital, protected blue-green asset. This corridor runs directly through the Home Farm site.
- **Irreversible Construction Damage:** Permitting this full planning application will ensure that the **GBI 7 corridor** is permanently severed, heavily degraded, and cut apart during the extensive

earthworks and construction stage.

- **Permanent Degradation:** The introduction of high-density housing, heavy machinery, road cutting, and artificial barriers directly targets the most sensitive, continuous branch of the **GBI 7** corridor, rendering the overarching neighbourhood policy impossible to deliver and functionally useless.

6. Unlawful Lack of CEMP within SAC Impact Risk Zone

The site sits entirely within the statutory **Impact Risk Zone (IRZ)** for the **River Wylfe**, a component of the internationally protected **River Avon Special Area of Conservation (SAC)**.

- **Omission of Mandatory Upfront Controls:** Because this is a *Full* planning application, a site-specific Construction Environmental Management Plan (**CEMP**) must be submitted and scrutinized *prior* to determination (p. 13). Advancing this application without a CEMP prevents statutory consultees from auditing necessary pollution and siltation controls and evaluating what environmental impact the development will have. (see Spurt Mead site pollution and CEMP failure pdf for the damage caused with a CEMP).
- **Precedent of Severe Siltation at Bishopstrow Mill:** Recent development works in the immediate area allowed heavy construction trucks to track tons of loose soil, mud, and gravel directly onto public highways, washing into the river system and causing a **massive, visible accumulation of silt at downstream Bishopstrow Mill**, choking fragile aquatic habitats. (see **Spurt Mead site pollution and CEMP failure pdf**)
- **Displacement of Protected Species:** This pollution has forced local apex predators, specifically **otters (a strictly protected SAC features species)**, out of their natural river habitats. Starving otters have been observed traveling up **Grange Lane** to hunt inside private residential garden ponds—proving that the local river ecology is at a breaking point and cannot withstand further unmitigated construction runoff.

Home Farm Site Work → Roadside Soil Tracking → River Siltation Influx

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Bishopstrow Mill Choked → Fish Stock Depletion → Otter Displaced to Grange Lane

7. Policy Breach: Wiltshire Open Space Standards

The application is a direct breach of the metrics set out by Wiltshire Council's core evidence base, specifically the *Wiltshire Open Space Assessment*:

- **The 480m Accessibility Threshold:** Wiltshire Council mandates a maximum baseline distance of **480 metres (a 10-minute walk)** to accessible Amenity Green Space for urban communities.
- **Systemic Green Space Deficit:** Due to the consumption of land in the East Ward by educational facilities and extensive military quarters, the local population already operates under a severe open space deficit.
- **The Kingdown Impact:** This deficiency was pushed to a critical crisis point recently when the public was permanently locked out of **Kingdown School's St George's Playing Fields on Boreham Field**, due to the erection of high-security perimeter fencing. The tokenistic space offered by the developer cannot match the vast scale, open configuration, or recreational function of the lost Kingdown fields.

8. Socio-Environmental Oppression & Quality of Life Data

The physical and psychological environment of Warminster's East Ward renders it entirely unsuitable for further high-density urban intensification:

- **Oppressive Physical Infrastructure:** The neighborhood is severely fractured by continuous, heavy-gauge security fencing flanking the railway lines, active military barracks, school boundaries, cadet facilities, and businesses. Navigating the ward involves moving through oppressive, concrete-and-wire corridors.
- **Acoustic & Atmospheric Pollution:** Due to the immediate concentration of the industrial trading estate, transport links, and heavy military logistical transport, the ward experiences high baseline acoustic pollution and poor localized air quality.
- **Irreplaceable Health Buffer:** Home Farm acts as an irreplaceable ecological sink, dampening sound waves and filtering airborne emissions. Replacing this natural lung with a high-density housing estate—packaged with a token, noisy, waterlogged roadside patch—will permanently

lock in an oppressive, low-amenity environment for the community damaging health and well being and putting more strain on the already inadequate health services.

9. Macro-Ecological Severance & Destruction of Farming Conservation

The development represents an irreversible threat to biodiversity by introducing an artificial barrier into an actively managed wildlife corridor:

- **Destruction of Voluntary Agricultural Conservation:** In direct alignment with national biodiversity targets, the farming community on Salisbury Plain has actively adapted their land management. Farmers have deliberately removed commercial cash crops to cultivate **bird-and-bee wildflower mixed fields** designed explicitly to regenerate depleted pollinator and avian populations.
- **The SSSI-to-River Contiguous Link:** These expansive, nectar-rich habitats trail directly down from the **Battlesbury Hill Site of Special Scientific Interest (SSSI)** straight to the boundary of Home Farm. Home Farm's abundant wildflower meadows serve as the final, necessary low-altitude transition zone for wildlife navigating from the high plain down toward the River Wylye catchment .
- **The "Last Viable Route" Eradication:** Because alternative prospective blue-green pathways originally identified in early neighborhood mapping have been completely built out or physically obstructed, Home Farm remains the **only unblocked, continuous natural corridor** in the Esat ward area. Permitting a housing estate here breaks this hard-won ecological link, isolating species and directly undermining years of intensive conservation work by the local farming community.

10. Democratic Mandate: The Neighbourhood Plan LGS Survey

The proposal seeks to override a clear, documented democratic consensus:

- **Overwhelming Public Demand:** In the comprehensive population surveys executed for the **Warminster Neighbourhood Plan 2**, the community explicitly voted and requested that **Home Farm be preserved and designated as a Local Green Space (LGS)** under National Planning Policy Framework (NPPF) guidelines (p. 6).
- **Compliance with NPPF Criteria:** Home Farm comprehensively ticks every statutory requirement for LGS designation under **NPPF Paragraph 107**:
 - it is in reasonably close proximity to the community it serves;
 - it is demonstrably special to the local community holding a particular local significance for its recreation, tranquility, and richness of wildlife; and
 - it is local in character and historic setting (p. 30).
- 144 people that live close to the site filled out a survey (see Home Farm LGS) that asked for the site to be made into a LGS, as it is vital to mental health, physical health and well being, tranquility, wildlife and enhanced by its open views and historic setting. Development even with the best mitigation would destroy all of these key benefits in an area with a deficit of accessible open green areas vital to well being.

11. Conclusion & Grounds for Refusal

The Home Farm site is entirely unsuitable for development. The minimal contribution this speculative site would make to housing supply targets cannot justify the permanent, irreversible destruction of the **GBI 7 Battlesbury to Wylfe Corridor**, the disruption of an active SSSI-to-SAC wildlife corridor (p. 3), the undoing of local farmers' conservation initiatives, the direct breach of Open Space standards, and the total disregard for the community's democratic survey (p. 6).

Furthermore, the blatant violations of **NPPF Paragraph 187(e), 102(a), 135, and 186(a)** regarding water safety, pollution exposure, biodiversity loss, and design hazards—combined with unassessed construction impacts, unexamined town-wide cumulative stresses, and reliance on arbitrary nutrient credit schemes—represent a fatal flaw in this submission (pp. 3, 29, 40).

The site breaches core policies CP 1 : Settlement strategy for Warminster in policy 31.

CP 2 Delivery Strategy : is outside the settlement boundary.

CP 50 Biodiversity : damage by isolating and degrading habitats especially the river Wylfe SAC and Salisbury Plain SAC.

CP 51 Landscape : Destroying the open view to and from the Cranbourne Chase AONB and Salisbury Plain Local Landscape Character area with the associated ancient monuments in each also being damaged.

CP 52 Green infrastructure : this site destroys a green network and associated rights of way and recreational routes.

CP 57 High quality design: the development is an urban design in a rural setting, totally out of keeping and detrimental to the setting of the protected ancient monuments.

CP 58 Conserve and enhance the Historic environment: open connected fields are the key setting attributes of these linked ancient monuments and the associated conservation area of Bishopstrow, development destroys this link causing significant harm.

CP 59 World Heritage sites: Despite this area not yet being a world heritage site the discovery of a very rare super/mega henge at Bishopstrow in combination with all the other known historic features is moving this area closer to this status, which might not have been granted now but is a potential when future discoveries are recorded.

CP 69 Protection of the river Avon SAC : nutrient credits won't protect fish spawning grounds locally which are damaged by pollution already.

We strongly urge the Planning Committee to uphold national, local, and neighbourhood planning policies, protect public safety, safeguard the River Wylfe headwaters, and **refuse planning**

permission for application PL/2026/02717.