

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	06/02/2026
Application Number:	PL/2025/09822
Proposal:	Extension to storage building
Site Address:	Hillbrush Company Ltd, Norwood Park, Castle Street, Mere, BA12 6FE
Case Officer:	Kate Clements

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	Ancient Woodland/Priority Habitat	CP50, NPPF, Habs Regs	06/02/2026 Ecological Mitigation and Enhancement Strategy/Plan, to include; proposed ecological enhancements and suitable buffers proposed around features/habitats. Details of how the ancient woodland will be protected during both construction and occupation.	NO
2	Ecological Impact Assessment (EclA)	Habs Regs, WCA, NPPF, CP50	06/02/2026 An Ecological Assessment has not been submitted in support of this application, assessing the potential impacts on protected habitats and species, including Priority Habitat Ancient Woodland.	NO
3	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the	06/02/2026 Clarification of BNG Exemption and/or Submission of statutory metric calculation with the correct baseline habitats, condition assessments and	NO

		Environment Act 2021)	associated baseline habitat plans.	
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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:

- Proposed Site Plan. 18 November 2025. Brimble Lea. Drawing No. 25103-5. Rev. A;
- Proposed Elevations. 07 November 2025. Brimble Lea. Drawing No. 25103-3. Rev. B;
- Existing Site Survey. 15 November 2025. Brimble Lea. Drawing No. 25103-4. Rev. A;
- Existing Plan and Elevations. 07 November 2025. Brimble Lea. Drawing No. 25103-1. Rev. B;
- Planning Statement. 04 December 2025. Brimble Lea.

Ancient Woodland/Lord's Wood CWS

The application site borders Nor Wood South County Wildlife Site (CWS), which is classified as a conifer plantation on an ancient woodland site. Ancient woodland is an irreplaceable and protected habitat under NPPF paragraph 193(c). Paragraph 193.c of the NPPF which states that '*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*'. Woodland of this type is also important to protected and notable species including bats and dormice. It is anticipated that bats use the area for foraging and commuting and therefore the woodland edge must be protected from damage during construction.

Ancient woodland must be adequately buffered in accordance with Government guidance, which states that "proposals should have a buffer zone of at least 15 metres from the boundary of the woodland." The submitted Proposed Site Plan indicates that the extension to the storage building would be located within 15 metres of the adjacent ancient woodland. Given the proximity of the proposed extension to the ancient woodland boundary, additional information is required to demonstrate compliance with national policy and guidance. An updated layout plan should be provided clearly showing that all built development is located outside the 15-metre buffer to the adjacent priority habitat coniferous woodland / ancient woodland. The buffer should be clearly identified as a construction exclusion zone, with details of how woodland trees and habitats will be protected during both construction and operation to avoid any loss or deterioration of this irreplaceable habitat. Clear avoidance and protection measures should be included. Should proposals change such that tree or scrub removal within or adjacent to the woodland is required, further surveys would be necessary and mitigation measures would need to be reviewed and revised accordingly.

Protected Species

No ecological information has been submitted in support of the application and therefore insufficient information to determine potential impacts on habitats and protected / notable species has been provided. Should any be identified, additional information will be required to support the application including an impact assessment and where appropriate, avoidance and/or mitigation measures to minimise those impacts. 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.

Biodiversity Net Gain

From 12 February 2024, Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

The submitted application form states that the site is “completely hard-surfaced with no habitats”. However, the site photos and the aerial mapping of the site shows the site is not an area of hardstanding, as such the de minimus exemption does not apply. The applicant must provide suitable justification and evidence to support the de minimus exemption. If no exemption applies, the application will be required to demonstrate how it will deliver 10% BNG in line with statutory requirements, supported by a completed statutory metric (including condition assessment sheets and habitat maps).

Applications subject to the biodiversity gain condition must be accompanied by minimum information set out in [Article 7 of The Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#), which includes:

- [the completed metric calculation tool](#) showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a description of any [irreplaceable habitat](#) (as set out in [column 1 of the Schedule to the Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#)) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Note: this is a summary, please refer to Paragraph: 011 [Biodiversity net gain - GOV.UK](#) for full details.

If the applicant considers that the development would not be subject to the biodiversity gain condition, Schedule 7A of the Town and Country Planning Act 1990 the applicant must provide a statement as part of the planning application setting out the reasons why they believe this is the case. Submission of a completed metric calculation tool may be necessary to evidence the statement.

Core Policy 50

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 186 d).

Wiltshire Core Strategy Core Policy 50 states “*All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development*”. In accordance with Core Policy 50, development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term.

While it is not expected that this development will result in significant loss of habitat, both CP50 and NPPF requires the inclusion of biodiversity enhancements, such as bird and bat boxes. Further details should be provided on the number and types of bird and bat boxes to be included, and the location of these enhancements must be included in the site plan drawings and will become an enforceable part of the planning permission. Bird/bat boxes will continue to be available for bats/birds for the lifetime of the development.

CONDITIONS: these will be added once the issues above have been addressed

Sign off by WC Ecologist will only be given once ALL outstanding information has been submitted and agreed sufficient.

Ecologist	Date