

Barley Close Farm Commercial Storage Yard Rationalisation Design and Access Statement

1. Background

The Barley Close Farm commercial unit complex is located about 0.8 mile from the A342 and the market towns of Devizes (5 miles) Chippenham (8 miles) Melksham (5 miles), being close to the Village of Bromham. The nearest motorway connection is J17 of the M4 (13 miles).

The applicants are the Howard Family who through their company Howard Holdings Ltd own the Barley Close business units site which they acquired to develop as a long-term hold commercial property investment.

The uploaded application site map shows the extent of their ownership and the existing business employment units. All of the units have been refurbished and let to local businesses. The internal sizes of the existing units are:

Unit 1: 784 sq m

Unit 2: 285 sq m

Unit 3: 196 sq m

Unit 4: 139 sq m

The total site area owned is 0.76 ha of which 0.32 ha is utilised by the existing units and related car parking and access leaving 0.44 ha for future employment use expansion.

Representation has been requested and made to the Bromham PC Neighbourhood Plan consultation process and it is understood the proposal has been favourably received for the redevelopment of the remainder of the site for employment uses.

It should be noted that a good proportion (2,000 sq m) of this underdeveloped land was previously used for outside commercial storage and parking and soil waste storage (2,250 sq m) and is therefore technically in planning terms already brownfield land.

Prior to the refurbishment and letting of the business units the applicant in 2016 researched the planning history with the Wiltshire Economic Development and Planning service (Appendix 1).

The conclusion was that buildings had an established industrial/distribution user(B2/B8) with ancillary office(B1) use and had the benefit of the existing ancillary open storage and parking area coloured brown.(Appendix 4 Application site plan and Google Earth aerial photos 2002 and 2006)

2. The Application

This planning application is to regularise the open storage use of the northern section of the yard as shown on the uploaded planning application plan which is shown edged red and coloured green and totals 2,250 sq m.

The southern section of the yard coloured brown which totals 2,000 sq m already has an accepted planning user for open storage and parking.

You will note that historical research has revealed that the original commercial vegetable grading and packing business users of the site previously used the application area for storing soil waste products generated from vegetable washing and arguably this land could be regarded

as historical brownfield land. Since the applicants purchased the complex they have not utilised this part of the site and the intention is to remove the mound of soil waste before completing the leveling and stoning of the site to match the existing hard standing area coloured brown.

The overall yard will then be utilised by the existing business unit users for storage and so there will not be any notable increase in traffic generation in the locality as detailed in the accompanying highway assessment correspondence.

3. The Scale of the Application

The application includes **230 sq m** of proposed BNG grassland inclusive of **30 small trees** - species listed below and the planting of a double row beech and hornbeam hedge on the west north and east boundaries.

The net application open storage and parking use area is therefore **2,000 sq m** which provides a total net yard area of 4,000 sq m inclusive of the existing yard area.

4. The Design Principles

To remove the unsightly historical soil mound and to create a level uninterrupted matching open storage yard to be utilised by the existing business tenant users in conjunction with their onsite businesses and to provide suitable site screening and appropriate compatible on site BNG.

To shield the public footpath BROM 36 that runs alongside the eastern boundary of the site.

5. The Extended Yard Specification

- To excavate and remove the existing soil waste mound to sub soil level
- To install a Terram (Non-Woven Geotextile MT700) layer
- To overlay and compact a 150mm of crushed stone (6F5) to match the existing yard level
- The surface will be permeable as per the existing yard and there is no requirement for any further drainage

6. Landscaping and Biodiversity Net Gain (BNG) and Appearance

The completed site will be level and is already partly bunded and screened on the west side.

The ecology development site baseline and BNG assessment by Herdwick Ecology (Appendix 2) has confirmed that the site should deliver 230sq m of grassland and 30 small trees. This has been purposely located on the northern boundary of the site because it will then be adjacent on 3 sides to the proposed double row hedge which carries some BNG value and a wildlife corridor around the perimeter to and from the BNG area. The ecological area is also located away from the busiest part of the overall business complex providing less ecological interference.

A Beech and Hornbeam hedge species mix has been selected because it will be quick growing, vigorous in dense leaf development and the winter leaf retention will provide adequate winter screening.

The proposed new hedge will be kept at an annual Winter/Spring net target height of 2.5m but will be trimmed only in early Autumn following bird nesting.

The 30 native small tree mix:

- Hazel *Corylus avellana*
- Field maple *Acer campestre*
- Bird cherry *Prunus padus*
- Blackthorn *Prunus spinosa*
- Rowan *Sorbus aucuparia*

The grassland will be a diverse seed mix - *EM1 Basic General Purpose Meadow Mixture*

7. Traffic Generation and Access

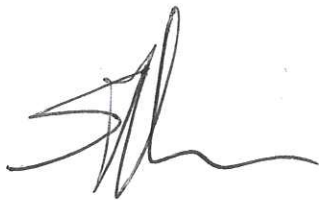
There will be no new access required as the yard is already served by the main existing complex highway access and then through the existing dedicated complex access route to the existing yard gates.

PFA Consulting on behalf of the applicants have consulted with Wiltshire Highways Development Control with regard to traffic generation and the planning application proposals as summarised in their letter of 26th November (Appendix 3).

A suitable draft highways planning condition has as a consequence of the discussions been agreed with Wiltshire Highways as follows:

***“The hereby approved open storage area will be used only in conjunction with the operational uses of the existing building units at Barley Close Farm accessed from New Road.*”**

Reason: In the interests of highway safety”



S J Humphris MRICS FAAV

Countryside Solutions

19th February 2026

APPENDIX ONE

Steve

From: Sanger, Jane <Jane.Sanger@wiltshire.gov.uk>
Sent: 10 May 2016 17:53
To: Steve
Subject: RE: 15/10673/FUL - Barley Close Farm, New Road, Bromham

Dear Steve,

Further to my telephone conversation with you earlier today, I have put together a comprehensive list which shows the Council's record of the planning history for the above site (below). I am only able to comment on what our records state. The actual use of the site could be used in accordance with these planning permissions, or in breach of planning approvals and is also subject to changes applicable under the use classes order relevant to the time period. Ultimately it is for you/your client to evidence the use of the site, as you will be in the best position to advise on past/current uses.

I note the site comprises two detached industrial units constructed from concrete block and steel cladding, set within a substantially sized plot, close to the junction of New Road, with Hawkstreet, Bromham.

Having regard to the list below, the majority of the permissions relate to B1 use which historically were relevant to the two-storey office building, formerly part of the site and sold to Wiltshire Fire & Rescue Service at the end of March 2012. Currently, this building has a D1 use and operates as an occupational health unit. B1 office use is the predominant permission sited below, there is no mention of a B8 distribution use as such, however, it is clear from the letter attached to your email dated 11.04.2016 that the established use of the site has been for washing, packaging, marketing and distribution of fruit and vegetables to the local community in the interim, when the business was formed in 1996, which progressed to selling wholesale fruit and vegetables to markets around the UK, until the company ceased trading in 2011 and the buildings became vacant. This is an established industrial/distribution use (B2/B8), with office (B1)/ancillary office use. If you were challenged on it, you could apply for a certificate of lawful use.

Planning history:

- E/2012/1298/FUL – Demolition of existing warehouse building and erection of 5no. detached dwellings and associated infrastructure – Refused 29/01/2013, dismissed on appeal on 25/02/2014;
- E/09/1137/FUL – Retrospective application for change of use from B1 (office) use to D1 (non-residential institutions use) – Approved on 26/10/09 (Applicant Wilts Fire & Rescue Service) (**presumably for their occupational health use**);
- K/58948/F – Use of land to site up to 3 caravans for seasonal migrant workers – Approved 21/07/08;
- K/52479/F – Lean-to existing warehouse to house cool room – Approved 17/08/05 (Applicant Bromham Growers);
- K/12699 – Construction of waste compactor shelter & provision of chimney for incinerator – Approved 06/10/98 (Applicant – Mortimers);
- K/12554/A – Freestanding boards signs – Refused – 25/08/1998;
- K/35285 – Use of land for keeping horses. Erection of stable block, all weather arena & associated works – Approved 27/01/1998 (Applicant Mr & Mrs Shepherd) (**this sounds like it might not be related to this site, possibly a rogue entry**);
- K/34722/F – Removal of condition no. 6 of application K/10694 to allow for the use of office accommodation unconnected to the fruit and vegetable business on the site – Approved 08/09/1997 (Applicant BGL);
- K/34133/F – Lean-to extension to existing building to house two cool rooms – Approved on 25/04/1997;
- K/32197 – Change of use of buildings to business use (Class B1 (1995 Use Class Order) – refused on 21/12/95, withdrawn on appeal 06/12/96.
- K/20990 – Change of use of existing office building to form a single dwelling – Approved 16/12/93;
- K/20372 – Demolish greenhouses & water tank, convert barns to 2no. cottages, & erect replacement agricultural building – Approved 19/07/93 (Applicant Mr M. Angell);
- K/13400 – Change of use of agricultural land to garden – Approved 24/01/89 (Applicant Mortimers);
- K/10694 – Two-storey office building – Approved 16/07/1987 (**presumably when WF&RS were renting the building from BGL**);

- K/86/0797 – Car park extension – Approved 03/03/87;
- K/82/0337 - Agricultural Stores – Approved 24/06/82.

This letter constitutes the informal opinion of a planning officer which does not take into consideration the views of the occupiers of neighbouring properties. If you decide to submit a planning application, it would be the subject of public consultation, for which the Council are unable to anticipate the outcome.

Please note that the views expressed in this letter represent an officer's opinion only and are made without prejudice to any decision which the Council make on an application. Please also note that issues other than those raised in this email may only arise as a result of the submission of fully detailed information accompanying a planning application and /or as a result of the consultation process.

I should also state that this email is not intended to nor should it be construed as a formal determination. If you require a formal determination of whether planning permission is required then you should apply for a Lawful Development Certificate under section 192 of the Town and Country Planning Act 1990. I would stress that if you act on the basis of this formal view the Local Planning Authority cannot be held responsible for any abortive work or expense which may result if it transpires that planning permission is not required at a later date following the provision of further information or investigation.

I hope this helps you with your marketing strategy.

Regards,

Mrs J Sanger
Planning Officer
Economic Development and Planning Service - Central Team
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Office Email: developmentmanagementeast@wiltshire.gov.uk

Working Pattern: Mondays 0830-1430, Tuesdays 0800-1600 & Wednesdays 0930-1430.
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From: Steve [mailto:Steve@CountrySideSolutions.co.uk]
Sent: 11 April 2016 13:56
To: Sanger, Jane
Cc: Robert Howard (lorryexports@hotmail.co.uk); Richard Howard; carl@kennetdesign.co.uk
Subject: Barley Close Farm

Dear Jane

As explained on the telephone this morning I have been appointed by the Howard family the owners of the site to proceed with the marketing of the site for commercial letting for workshop and storage type uses.

Before I commence with this task it is very important that I have a clear understanding of the correct use classes for the site so that I can correctly detail this in the letting particulars. I have undertaken some research and please find attached a copy of the letter submitted by Bromham Growers Limited (BGL) in support of their residential planning application/appeal for the site which I downloaded from the WC planning application portal.

It explains their use and history for the site. It is very clear I think from what they say and what I know of the site that BGL and indeed also Mortimer Fruit Shops Limited (MFSL) were both private commercial company enterprises and not vegetable growers or co-operative organisations. They bought in produce from third party growers including some imported fruit and veg and then washed, graded, stored, and packed, marketing and reselling from offices on site and then distributing fruit and veg to the wholesale market and supermarkets.

The 16 year use under BGL prior to 2012 for the site was thus entirely commercial and indeed beyond that by the previous owner occupiers MFSL. The outside storage areas were utilised for storing silt from vegetable washings and packing materials and related commercial lorry and employee vehicle parking. I therefore concluded that it is correct to classify the use class as B1 and B8. Please can you kindly confirm your understanding of this before I proceed with the marketing of the site.

I can also confirm that I have recommended to my clients, who have agreed, that the current planning application for the external boundary fencing should be withdrawn as now that they have decided to let the complex the fencing application is premature because the 2 buildings may well be let separately and access and boundary fencing requirements will need to be reassessed once potential interested tenants have been secured and their specific requirements have been identified. A more comprehensive planning application can then be submitted covering these aspects if required. Nevertheless the fencing application has been useful as the process has identified the type of fencing arrangements that WC would like to see. I therefore also confirm the withdrawal of the fencing application 15/10673.

I look forward to your response on the use class and confirmation of the withdrawal of the current fencing application.

Regards

Steve Humphris

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APPENDIX TWO



Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment
Land to the Rear of Unit 1, Barley Close Farm, Bromham, SN15 2JA

For and on behalf of Howard and Sons Limited

January 2026

DOCUMENT CONTROL SHEET

Project Name: Land to the Rear of Unit 1, Barley Close Farm, Bromham, SN15 2JA
Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment

Client: Howard and Sons Limited

Report Reference: 437/R1/2026/V1

Revision Status:

Rev No.	Status	Author	Date
1	Draft for Review	CG	18/01/2026
1	Final	CG	18/02/2026

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Herdwick Ecology cannot be held liable for any information provided by third parties which is referenced within this document.

The evidence which Herdwick Ecology has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional opinions.

1.0 Introduction

- 1.1 Herdwick Ecology Ltd has been commissioned by Howard and Sons Limited to undertake an Ecological Appraisal and Biodiversity Net Gain assessment Land to the Rear to Unit 1, Barley Close Farm, Bromham, SN15 2JA (Central Reference ST) to inform proposals for the consolidation of an outside storage area.
- 1.2 This report has been prepared by Ceri Griffiths, Director at Herdwick Ecology, who is a Full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Reference is made to CIEEM Guidelines for Preliminary Ecological Appraisal¹ and BS 42020:2013 Biodiversity - Code of practice for planning and development². The Statutory Biodiversity Metric has been used, with habitat data collated during the survey to assess the baseline units.

2.0 Aims and objectives

- 2.1 This report support a full planning application to Wiltshire Council and aims to:
- Review the relevant biological records and assess their significance;
 - Identify any protected species issues or potential issues that may exist;
 - Assess possible ecological constraints to development and make recommendations to avoid, minimise and mitigate for any potential impacts during the development; and
 - Set out opportunities for net gain and ecological enhancements in line with relevant planning policy, legislation and other published guidance to inform a detailed application.
- 2.2 With regards to the Biodiversity Net Gain assessment, this report will also:
- Present the baseline habitat value of the development site;
 - Present the habitat value of the proposed landscaping incorporated into the post-development design; and
 - Present the overall net habitat value change in both habitat units and a percent change.

3.0 Legislation and Planning Policies

- 3.1 In carrying out this assessment relevant legislation, planning policies, and best practice guidelines were consulted and include:
- Conservation of Habitats and Species Regulations 2017 (as amended);
 - Wildlife and Countryside Act 1981 (as amended);
 - Countryside and Rights of Way (CROW) Act 2000;
 - Natural Environment and Rural Communities (NERC) Act 2006;

¹ CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal* (2nd. Ed.) CIEEM

² BSI (British Standards Institute) BS4202:2013 *Biodiversity – A code of practice for planning and development*. BSI, London.

- National Planning Policy Framework 2024 (NPPF);
- Local Planning Policies and supplementary planning documents/technical guidance.

National Planning Policy Framework (NPPF) 2024

- 3.2 National planning policy on biodiversity and conservation is set out in the National Planning Policy Framework (NPPF). This emphasises that the planning system should seek to minimise impacts on biodiversity and provide net gains in biodiversity wherever possible as part of the Government's commitment to halting declines in biodiversity and establishing coherent and resilient ecological networks. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. Relevant policies are set out below:
- 3.3 Paragraph 185: *"To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity..."*
- 3.4 Paragraph 186 states: "When determining planning applications, local planning authorities should apply the following principles:
- a) *'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'*
 - b) Relates to developments affecting SSSI
 - c) Relates to developments affecting irreplaceable habitats, such as ancient woodland
 - d) *'Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity'.*
- 3.5 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.
- 3.6 The above approach encapsulates the 'mitigation hierarchy' described in British Standard BS 42020:2013, which involves the following step-wise process:
- Avoidance – avoiding adverse effects through good design;

- Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;
- Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm; and
- Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.

- 3.7 The measures for avoidance, mitigation, compensation, and enhancement should be '*proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development*'

Conservation of Habitats and Species Regulations 2017 (as amended)

- 3.8 In summary these regulations, also referred to as the Habitat Regulations, cover the designation and protection of European sites and the protection of European protected species (EPS).

Environment Bill and Biodiversity Net Gain

- 3.9 The Environment Bill received Royal Assent on 9th November 2021, becoming the Environment Act; this includes the provision of biodiversity gain for developments in England, which will be mandated through an amendment to the Town and Country Planning Act 1990. The two-year transition period that follows Royal Assent means that mandatory Biodiversity Net Gain (BNG) became law on 12th February 2024, with small sites being mandatory on the 2nd April 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)

Local Plan

- 3.10 The Wiltshire Core Strategy Development Plan Document ('the plan') was formally adopted on 20 January 2015. The plan provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026. Policy 50 'Biodiversity and Geodiversity' states that: '*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.... All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.* The policy goes on to state that all developments should seek opportunities to enhance biodiversity.

Species Protection

- 3.11 A number of species, including all bats and great crested newts, are afforded protection under The Wildlife and Countryside Act 1981 (as amended)
- 3.12 Under this legislation, a person is guilty of an offence if a person intentionally or recklessly:

- disturbs any animal while it is occupying a structure or place which it uses for shelter or protection;
- obstructs access to any structure or place which any animal uses for shelter or protection.

3.13 In addition the protection afforded through UK legislation, further protection is provided to a small group of species, commonly referred to as 'European Protected Species' under the Conservation of Habitats and Species 2017 (as amended) (also known as the Habitats Regulations), including bats and great crested newts.

3.14 With regards to European Protected Species listed under Schedule 2 of the Act, it is an offence to:

- Intentionally or deliberately capture or kill, or intentionally injure the animal;
- Deliberately disturb the animal or intentionally or recklessly disturb them in a place used for shelter or protection;
- Damage or destroy a breeding site or resting place;
- Intentionally or recklessly damage, destroy or obstruct access to a place used for shelter or protection.

3.15 The NERC Act also listed species of principle importance under Section 41 of the Act. This places further duties on the LPA to have due regard for the conservation of these species, such as hedgehog or certain bird species, which may be present on-site.

4.0 Methodology

Data Search

4.1 Online sources were reviewed, such as MAGIC³, to search for designated sites, priority habitats and records of local European Protected Species (EPS) licence. In addition, the Wiltshire Council planning portal was searched for nearby applications. A previous application was submitted in 2012 for a residential redevelopment of the wider site, which included a full Extended Phase I habitat survey and the historic data from the application, has been considered with this report.

4.2 Given the small scale of the development and habitats within the locality, a full data search was not considered necessary.

Preliminary Ecological Appraisal

4.3 The site was surveyed on 18th November 2025 by Ceri Griffiths, Director of Herdwick Ecology, with full membership of Chartered Institute of Ecology and Environmental Management (CIEEM) and a Natural

³ <https://magic.defra.gov.uk/>

England bat and great crested newt licence holder. Weather conditions were dry and overcast, with a temperature of 3°C.

Biodiversity Net Gain Assessment

- 4.4 The Statutory Biodiversity Metric is designed to provide a quantitative approach to assessing the changes in biodiversity value brought about by development or changes in land management. It is a habitat-based approach and uses the attributes of a habitat to provide a biodiversity value based on components such as distinctiveness, condition and strategic significance of the existing habitat as well as time to establish and difficulty of creation for proposed habitats.
- 4.5 The baseline BNG calculations, as outlined below, provides a numerical habitat value which indicates the existing value of the habitats present on the site based on the identified habitat types and their condition score.

Pre-development habitat baseline approach

- 4.6 The habitat baseline used to support the biodiversity net gain assessment has been taken from an habitat survey undertaken by Herdwick Ecology in November 2025. The Baseline Habitat data is illustrated in Figure 1 below.
- 4.7 The Statutory Biodiversity Metric habitat types are based on a set of habitats as defined by the UK Habitat Classification System (UK Habitat Classification Working Group, 2018), although there are some discrepancies between how some habitats are defined, as not all UK Habitat Classification System primary habitat types are included within the selection of habitats included within the metric.

5.0 Baseline Conditions

- 5.1 The Application Site lies in a rural location to the south of the village of Bromham in Wiltshire, 3.5 miles to the northwest of Devizes. It lies to the north of a small industrial site, comprising modern units, which is situated off New Road. There are a number of individual residential properties within the locality. The wider landscape is mainly agricultural, with some equestrian land interspersed with hedgerows and swathes of woodland. The predominantly tree/scrub lined Clackers Brook and its tributaries lies approximately 280m to the southwest.
- 5.2 Historically, the industrial units and wider application site was used for vegetable processing and distribution centre for a local producer. The Application Site was informally used as storage and comprised of a large area of bare ground in 2012 when an Extended Phase I Habitat Survey was carried out to inform a planning application for the site. A review of historic aerial imagery shows that there has been a varying amount of vegetation cover on the site since 2012 but with visible areas of bare ground and levels of use/disturbance.



Plate 1: Site Location

Data Search

Statutory and Non-Statutory Designated Sites

- 5.3 The Application Site lies within the consultation zone of the Bath and Bradford on Avon Bat Special Area of Conservation (SAC). This SAC comprises a number of individual sites across the wider landscape that support a larger population of greater and lesser horseshoe bats and Bechstein's bats. As stated within the Wiltshire Council planning guidance⁴, *'the populations of bats supported by these sites are afforded very high levels of legal protection, placing significant duties on decision-makers to prevent damage to bat roosts, feeding areas and the routes used by bats to travel between these locations'*.
- 5.4 There are no designated sites within 2km of the Application Site. The closest is the Spy Park Site of Special Scientific Interest (SSSI) that lies approximately 2.6km to the north. This SSSI is notified for its extensive habitat mosaic comprising large expanses of some of the finest undisturbed alderwoods in the county, along with oakwoods, parkland and an area of dry acidic grassland containing several locally uncommon plants and lichens. The Application Site does not lie within a SSSI risk zone for this development type
- 5.5 The closest non-statutory site is the Clinghill Wood that lies 550m to the south. This is an area of ancient semi natural woodland with an area of managed coppice.

⁴ DRAFT

Habitats

- 5.6 There are two parcels of deciduous woodland, a priority habitat within 500m of the Application Site. These lie 307m to the southwest and 450m to the east.
- 5.7 A waterbody is present 110m to the north of the Application Site. There are an additional five possible ponds identified between 250m to 500m from the Application Site boundary.

Species

- 5.8 There are three European Protected Species (EPS) licences within 4km of the site boundary.:
- Common & soprano pipistrelle and lesser horseshoe bat resting place (dated 2020-2030) – within 1.7km southeast
 - Common & soprano pipistrelle, brown long-eared and whiskered bat breeding and resting place (dated 2019-2024) – 2.9km west;
 - Soprano pipistrelle bat resting site (dated 2019-2025) – 3.6kmsouth
- 5.9 There is no EPS licence for great crested newts or eDNA data 2km of the site.

Preliminary Ecological Appraisal

- 5.10 The Application Site is 2250m² in area and comprises an area of bare ground that has recently been lined and covered in hardcore. A fence line runs along the northern and eastern boundary, of leylandii hedgerow within the fenceline along the southern edge of the western boundary. The site is open to the site. Towards the northern side of the site there are earth spoil mounds across which ruderal/ephemeral vegetation is beginning to establish. In accordance with the BNG regulations, the baseline should be backdated if site clearance has occurred in advance of the habitat assessment. In this case, the previous ecological survey is beneficial, and, together with the historic aerial imagery, demonstrates that the Application Site has had varying amount of disturbance, and vegetation cover, over the years. Therefore, whilst there has been some site clearance, given that it was previously classified as bare ground, it has been assessed as such for this purpose of this assessment.
- 5.11 The disturbed ground towards the north has patches of ruderal and ephemeral vegetation comprises false oat grass *Arrhenatherum elatius*, Annual meadow-grass *Poa annua*, *Lolium perenne*, cock's foot *Dactylis glomerata*, spear thistle *Cirsium vulgare*, common fumitory *Fumaria officinalis*, common chickweed *Stellaria media*, scentless mayweed *Tripleurospermum inodorum*, nettle *Urtica dioica*, periwinkle *Vinca* sp., black nightshade *Solanum nigrum*, prickly sow-thistle *Sonchus asper*, common hedge mustard *Sisymbrium officinale*, broadleaf plantain *Plantago major*, ground ivy *Glechoma hederacea*, creeping thistle *Cirsium arvense*, white campion *Silene alba*, broad leaved dock *Rumex obtusifolius*, spear thistle, field bindweed *Convolvulus arvensis* and creeping buttercup *Ranunculus*

repens. The habitat has been assessed as urban u1b6 (SVL in BNG metric) with ruderal/ephemeral (secondary code 81).

- 5.12 The UK Habitat Classification and Biodiversity Metric equivalents are provided in Table 1 below, along with justification for the habitat choice, where relevant.

Table 1: Baseline Habitats

UK Habitat equivalent	BNG Metric & Condition	Justification
Urban – Bare Ground U1b6 82	Bare Ground – Poor Condition	No criterion met
Urban – Bare Ground U1b6 81	Sparsely Vegetated Ground – ruderal/ephemeral . Poor condition	Justification provided above. Poor condition as passes one criterion (B)
Hedgerow (non-native) h2b 528	Lleynadii hedgerow – Poor condition	Unmanaged hedgerow with almost no ground flora due to species and heavy shading.



Plate 2: Baseline Habitats and Condition

- 5.13 The baseline habitat value, as assessed using the Biodiversity Metric is 0.45 habitat units, as shown in Table 2 below, with a linear value of 0.03 units.

Table 2: Baseline Habitat Values

Habitat type	Area (ha)	Strategic significance	Habitat units
Urban – Bare Ground	0.16257	No local strategy	0.33
Sparsely Vegetated Ground – Ruderal / Ephemeral	0.0623	No local strategy	0.12
Total habitat area	0.23		0.45

Table 3: Baseline Linear Values

Habitat type	Length (km)	Strategic significance	Habitat units
Urban – Bare Ground	0.026	No local strategy	0.03
Total habitat area	0.026		0.03

Species

Bats – Foraging/Commuting Habitats

- 5.14 There are no buildings within the application boundary and no potential roost features were noted with the leylandii. The surrounding habitats are likely to offer foraging and commuting habitat for bats, including those associated with the Bath and Bradford on Avon SAC. However, due to the small scale of the development and size of Application Site, the loss of a small area of ruderal vegetation will not have a detrimental impact to the local bat population. No further survey or assessment is required but avoidance, minimisation and enhancement measures have been set out in Section 5.

Badgers

- 5.15 The Extended Phase I habitat survey in 2012 recorded a badger outlier sett located in the northwestern corner off the Application Site. Given the disturbed nature of the site at the time of this Phase I survey, not further evidence could be distinguished. During the PEA survey, no evidence of badgers was identified. There are numerous mammal holes and across the earth mounds and along the leylandii hedgerow but none were attributed to badgers and rabbit activity was extensive. grassland may offer some foraging habitat for badgers but the Application Site itself does not provide suitable sett building habitat. Precautionary construction measures have been set out in Section 5.

Breeding Birds

- 5.16 The site offers limited opportunities for nesting birds, give the lack of dense vegetation and trees. The leylandii may offer some nesting habitat, but it is not considered significant and no further survey or assessment is required. Avoidance, minimisation and enhancement measures have been set out in Section 5

Amphibians - Great crested newts (GCN)

- 5.17 The desk study carried out for the previous application did not return any records for GCN. The Application Site lacks vegetation that would offer shelter for great crested newts. Whilst there is a pond within 250m of the site, given this lack of suitable terrestrial habitat, it is considered highly unlikely that great crested newts will be impacted on by the proposals. This can be substantiated through the use of the Natural England rapid risk assessment, as illustrated below (using SVL only). This is also precautionary as it assumes that the pond is used for breeding.

Table 4: NE Risk Assessment

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability score
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	No effect	0
Land 100-250m from any breeding pond(s)	0.01 - 0.1 ha lost or damaged	0.01
Land >250m from any breeding pond(s)	No effect	0
Individual great crested newts	No effect	0
		Maximum:
		0.01
Rapid risk assessment result:		GREEN: OFFENCE HIGHLY UNLIKELY

- 5.18 As such, whilst no further survey or assessment is required, a precautionary site clearance approach should still be adopted, as set out in Section 5 below.

Reptiles

- 5.19 As with the amphibians, the site is considered to offer negligible potential for reptiles. No further surveys or assessment is required and standard practice site clearance and construction measures are recommended.

Other protected/notable species

- 5.20 There is no suitable habitat for dormice. Other species that could be present within the locality are hedgehogs. Again, standard best practice site construction methods should be adopted, where necessary, as detailed in Section 5.

6.0 Avoidance, Mitigation and Enhancement Measures*Mitigation and Enhancement Measures*

- 6.1 In line with National and Local planning policies, developments should seek to ensure the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species populations. Therefore the following section sets out avoidance and mitigation measures that should be implemented, together with enhancement opportunities, with the aim of delivering a net gain in biodiversity, in line with the mitigation hierarchy.

Development Description

- 6.2 No further surveys are required to inform the application but appropriate measures to be implemented during construction are set out below.

Development Description and Biodiversity Net Gain

- 6.3 The proposals will involve the consolidation of an outside storage area. This will result in the loss of the earth/sparsely vegetated mounds and ruderal vegetation. The species poor/non-native hedgerow will be retained, with a newly planted hornbeam/beech hedgerow along the eastern boundary to aid in the visual screening of the site. In order to deliver the 10% net gain onsite, an area of 0.023ha of g3c 'other neutral grassland' will be created along the northern boundary, together with the planting of 30 small trees (7.5cm diameter at 1m height - poor condition) within the Application Boundary.

- 6.4 Tree species will be a mix of small native trees:

- Hazel *Corylus avellana*
- Field maple *Acer campestre*
- Bird cherry *Prunus padus*
- Blackthorn *Prunus spinosa*
- Rowan *Sorbus aucuparia*

Table 5: Habitats Created

Habitat type	Area (ha)	Condition	Habitat units
Urban – Developed land/sealed surface u1	0.21	n/a	0.00
Grassland – other neutral g3c	0.023	Moderate	0.15
Rural Tree	0.1221	Poor	0.34
Total area (ex trees)	0.23		0.50 (rounded up)
Total area (ex trees)	0.36		

Table 6: Hedgerow Created

Habitat type	Length (km)	Condition	Habitat units
Hedgerow – Native h2a	0.0887	Poor	0.17
Total area	0.0887		0.17

Table 7: Change in Biodiversity Units

Post-Development Biodiversity Units (created & enhanced plus retained)		Pre-Development Baseline Biodiversity Units		Change in Biodiversity Units
0.50 (Habitats)		0.45		+ 0.05 (10.22%)
0.20 (Linear)		0.03		+ 0.17 (653%)

- 6.5 In conclusion, the proposals results in a habitat biodiversity net gain of **10.22%** and a hedgerow net gain of **653%** and the trading rules have been met.



Plate 3 Proposed Landscape Plan showing BNG Enhancement Areas

- 6.6 The newly created grassland areas (within the BNG enhancement area) will be seeded with a more diverse mix, such as EM2 Standard General Purpose Meadow Mixture⁵.
- 6.7 In order to meet the target 'moderate condition' for the grassland on the verge, 3 – 5 of the following measures must be delivered (and 5 to achieve 'good')
- A) The appearance and composition must fit the UKHab definition of other neutral grassland;
 - B) The sward height must be varied with at least 20% of the sward >7cm in height, and 20% <7cm;
 - C) Bare ground is only between 1 to 5%
 - D) No bracken or scrub encroachment should be allowed to establish;

⁵ [EM2 Standard General Purpose Meadow Mixture - Emorsgate Seeds \(wildseed.co.uk\)](https://www.wildseed.co.uk/em2-standard-general-purpose-meadow-mixture)

- E) No invasive non-native species should be present or physical damage present (i.e. from storage, machinery etc)
- F) There are 10 or more vascular plants species per m² present (excluding species that are considered suboptimal for this habitat type).

6.8 Given that no significant enhancement measures have been incorporated into the design, a Habitat Management and Monitoring Plan (HMMP) and monitoring via a S106 is not considered necessary to implemented the above, given that it is for a small habitat area). A Landscape and Ecological Management Plan (LEMP) is considered for appropriate to ensure the delivery of the proposed landscape plan.

Mitigation Measures

6.9 Given the low ecological value of the site, there are minimal mitigation requirements but following measures should be implemented and secured via condition attached to the planning consent:

- Any new lighting will need to be sensitively designed to avoid light spill along the boundaries. This is of particular importance as the Application Site lies within the consultation zone of the Bath and Bradford on Avon SAC. Any new lighting should be designed and adhere to the principles set out in the ILP Guidance Note 08/18 Bats and artificial lighting in the UK to avoid excessive light spill.
- Foundation trenches and all excavations must either be covered overnight or must have scaffolding boards, or similar, placed within them to ensure that any animals that fall in are able to escape.
- Raise stored materials (that might act as temporary resting places for species such as amphibians and reptiles) off the ground, e.g. on pallets.
- Should any fencing be installed, occasional gaps must be left at the base (130 x 130mm) to allow movement of hedgehogs.

Species Enhancements

6.10 Habitat boxes or log piles for invertebrates, hedgehogs and reptiles can be placed along the eastern, western and northern boundaries to provide opportunities for species

6.11 In conclusion, the Application Site comprises habitats of low value and has negligible potential to support protected/notable species. A 10% net gain in biodiversity can be deliver and the proposals are in line with National and Local Planning Policy.

Appendix 1 Site Photographs



Plate A1: View across site looking north



Plate A2: Hedgerow along southern side of western boundary



Plate A3: Earth mounds to the northern side of the site

APPENDIX THREE

Our Ref: JA/MLB/H737-01

26 November 2025

Steve Humphris
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9 Scots Lane
Salisbury
SP1 3TR



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Wanborough Road
Swindon
SN3 4HG

Tel: 01793 828000

Email: admin@pfaconsulting.co.uk

Web: www.pfaconsulting.co.uk

BY E-MAIL: Steve@CountrySideSolutions.co.uk

Dear Steve

BARLEY CLOSE FARM, BROMHAM

I am writing to provide you with a summary of my discussions with Hannah Jones, Highways Development Control officer at Wiltshire Council, with respect to the proposed planning application to regularise the northern part of the land at Barley Close Farm, Bromham to open storage, as identified on the attached plan. Hannah would be the one consulted on any future planning application, and was previously involved with the site in 2022 with planning application (PL/2022/04967) for the extension of Unit 1 for a customer reception and showroom area; which was consented and has subsequently been built-out.

I had a team's meeting with Hannah on 17 October 2025 to discuss the proposed planning application. Hannah confirmed that from a highways perspective there would not be an issue with regularising the use of the northern area of the site to open storage, as long as the use of this land was tied to the occupation of the existing buildings on the wider site.

Hannah considered that without such a restriction there was the potential for an intensification of the use of the site, resulting in additional traffic using the surrounding lanes, and associated highway safety concerns.

Hannah also advised that any subsequent development proposals on the site that involved a new structure would require a new planning application; the highway impacts of any such proposals would be dealt with on their merits at that time.

I understand that the client has agreed to the provision of restriction which ties the use of the land subject to the application to the occupation of the existing buildings on the wider site. I have had subsequent discussions with Hannah and have agreed to the following wording for a planning condition which is acceptable to the client.

The hereby approved open storage area will be used only in conjunction with the operational uses of the existing building units at Barley Close Farm accessed from New Road.

Reason: In the interests of highway safety.



Certificate Number 32553

I trust this provides you with the information on highways matters needed to progress the planning application; please don't hesitate in contacting me if you have any queries.

Yours sincerely

A handwritten signature in blue ink that reads "J. Alexander". The signature is written in a cursive style with a large, stylized 'J'.

Julian Alexander

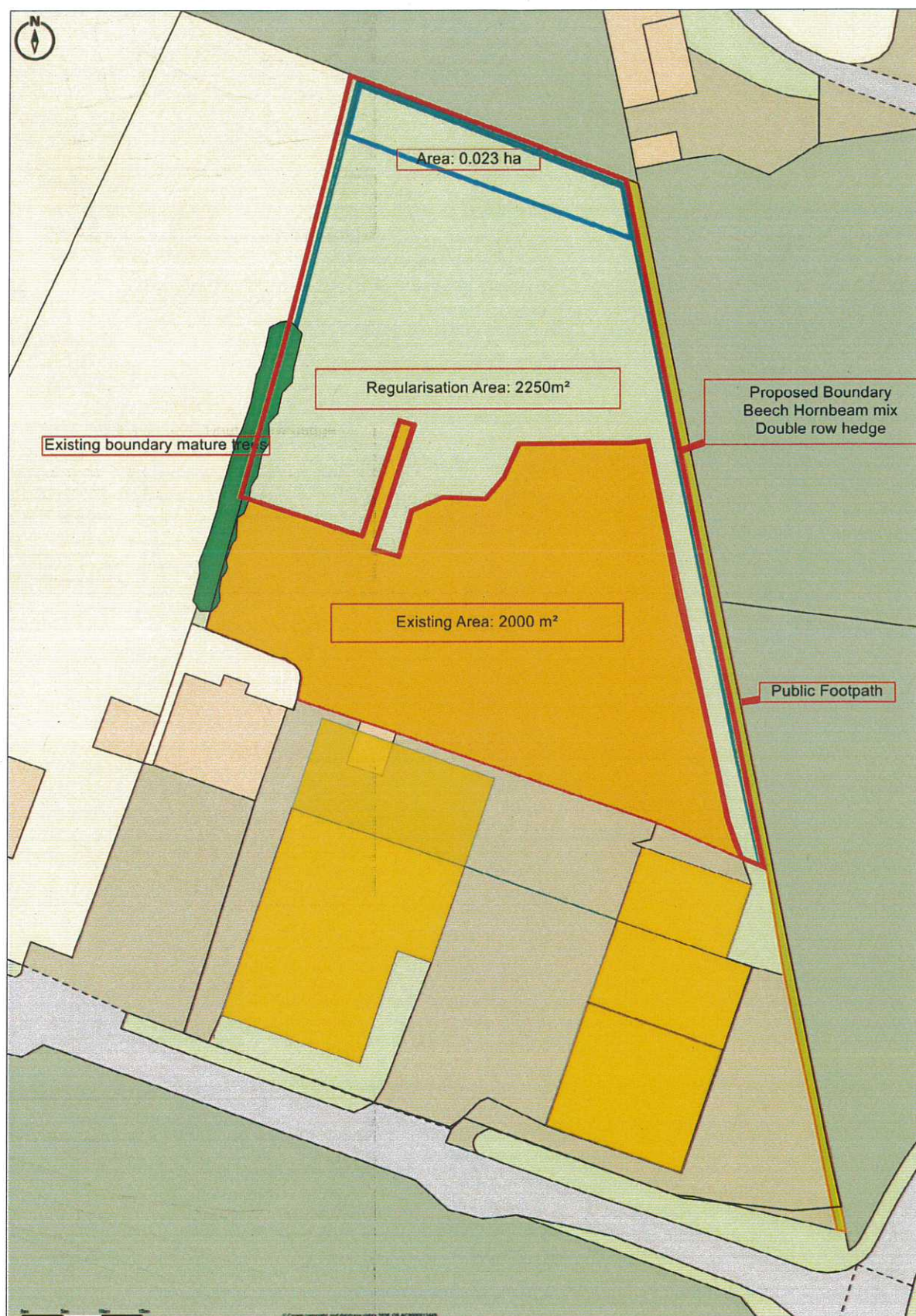
Director

Email: jalexander@pfaconsulting.co.uk

Enc: Plan showing the Northern Area of the Site which is to be the subject of the Planning Application

APPENDIX FOUR

Barley Close outside storage yard
Regularisation of yard area boundary



Promap
LANDMARK INFORMATION

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Plotol Scale - 1:500 Paper Size - A3

Application Area edged red coloured light green
Proposed new grassland BNG including 30 new small deciduous trees edged blue



