

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	13/07/2026
Application number:	PL/2025/07278
Proposal:	Extension to Brickworth Quarry (Sandland) to allow the extraction, processing and export of sand followed by backfill with imported inert materials and quarry waste; Importation and blending of sand; Retention and continued use of site compound and buildings, plant site and storage areas; Restoration to commercial forestry and agriculture at original ground levels together with long-term biodiversity enhancements
Site address:	Brickworth Quarry, Whiteparish, Salisbury, SP5 2QE
Case officer:	Adam Madge

Recommendations:

	No Comment
	Support
	No objection
x	Condition (no objection subject to conditions)
	Objection - further information required
	Objection in principle
	HRA completed/required

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	GCN – European Protected Species	Habitat Regulations, Core Policy 69	GCN Rapid Risk Assessment and supporting mitigation strategy where required	YES DLL 21/5/2026
2	Dormouse-European Protected Species	Habitat Regulations, Core Policy 69	Dormouse Mitigation Strategy	YES CEMP
3	LEMP	Core Policy 50- no net loss	Production of a LEMP to support dormouse and GCN habitat at restoration	YES LEMP
4	BNG	Environment Act	Amended baseline to support the existing site plan.	Not required Note: Maps not updated to support this

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.

I have reviewed the application and supporting documents against OS Maps and aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Site location plan 3404-5-2. August 2025. David Jarvis Associates
- Environmental Statement. September 2025. Raymond Brown
- Restoration Scheme 3404-5-2. September 2025. David Jarvis Associates
- Environmental Statement Chapter 7: Ecology. September 2025. Raymond Brown
- Arboricultural Impact Assessment and Method Statement. Wessex Woodland Management
- Statutory Biodiversity Metric. August 2025. Georgie Starkie
- Existing Site Plan 3404-5-2. August 2025. David Jarvis Associates
- Preliminary Ecological Appraisal and Ecological Impact Assessment. February 2026. Stark Ecology
- Environmental Statement Addendum. March 2026. Raymond Brown
- Sections A-A & B-B 3404-5-2. September 2025. David Jarvis Associates
- Construction Environment Management Plan. Stark Ecology. May 2026
- Preliminary Ecological Appraisal and Ecological Impact Assessment. May 2026. Stark Ecology
- Landscape Ecological Masterplan. May 2026. Stark Ecology
- IACPC. May 2026. Natural England
- DLL-ENQ-WILT-00143 Annex 3 Map. April 2026. Natural England

Protected and Notable Species/Habitats

It is stated that the proposals will result in the loss of an area of cropland and neutral grassland with potential impacts on bracken dominated field margins. Boundary features are assessed to include woodland edges, scrub, and a mature oak tree which are not proposed to be impacted by the scheme. It is anticipated that following quarrying activities, those habitats to be impacted will be reinstated [as per Restoration Scheme 3404-5-2. September 2025. David Jarvis Associates.](#)

GCN

A pond lies approximately 60m south east which was recorded to support a small population of GCN. The grassland and field margins within this development proposal provide some terrestrial habitat suitable to support GCN and although the pond won't be directly impacted by the scheme, impacts to GCN cannot be ruled out.

[A Rapid Risk Assessment has now been carried out which states that the proposals are highly likely to lead to an offence. The Ecology report states an enquiry has been submitted to NE to register the site under DLL, however no additional information was submitted in support of this application. If the scheme is accepted under the District Level Licensing Scheme for Great Crested Newts, the *Impact Assessment and Conservation Payment Certificate \(IACPC\)*, which must be signed by the applicant and countersigned by Natural England must be submitted to the LPA prior to determination.](#)

[Please note: 'Annex 3: Site Location' must also be submitted with the IACPC and correspond with the red line site boundary submitted with the planning application.](#)

[A signed IACPC \(DLL-ENQ-WILT-00143\) and Annex 3 Map have been submitted in support of the application, which is welcomed.](#)

Dormice

Dormice are afforded stringent protection under the Conservation of Habitats and Species Regulations 2017 (as amended) and as such are a material consideration within the planning process. Dormice are known to be present within the wider quarry site. Suitable habitat in the form of woodland, hedgerow, bracken and scrub habitat lies within the proposed red line boundary, there is therefore potential for dormice and their habitats to be impacted by the proposal.

Where works that may contravene the legislation afforded to dormice will occur, a European Protected Species (EPS) dormice Mitigation Licence may need to be obtained for the lawful construction of this development to ensure that favourable conservation status of dormice can be maintained should the application be approved.

The woodland and scrub habitat are proposed to be retained and protected during extraction operations with Heras fencing as outlined within the Arboricultural Report. It is noted however, that no consideration has been given to the bracken habitat and it is unclear to what extent this area will be impacted. Although not optimal dormouse habitat, they are known to use this habitat type and it would appear to be functionally linked to existing woodland and scrub habitat and therefore dormice within the operational area cannot be ruled out.

Sufficient and appropriate mitigation measures to ensure that dormice are not adversely affected as a result of the proposed development must be submitted as part of the proposal, and shown on development drawings, where dormice are present, or likely to be present. This should comprise of a dormouse mitigation strategy which outlines the areas of habitat suitable to support dormice, the measures to be taken to protect and enhance these habitats during both construction and operation and decommissioning.

From the arboricultural drawing, Heras fencing is not proposed along the southern section of planted mixed woodland in the northern parcel. It is understood that there may be an existing fence however this is unclear. This should be clarified within the dormouse mitigation strategy to ensure impacts on dormice are minimised.

The Existing Site Plan also indicates that existing vegetation occurs along the western boundary of the southern parcel which is not included within the Appendix 1: Habitat Map and no impact assessment of this loss is included. These inconsistencies in habitat mapping are discussed further below but should habitat in this area be lost, this should also be included within the dormouse mitigation strategy.

The current proposal conflicts with Core Policy 50 of the adopted Wiltshire Core Strategy 2015 and Paragraphs 192 (b) and 193 (a) of the National Planning Policy Framework December 2024, because mitigation is not included in the proposal.

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 LPAs ecology team prior to determination of the application.

It is noted that bracken habitat has been removed from the excavation proposals and will be protected from extraction activities as identified in Figure 3 of the CEMP through provision of Heras fencing. However, it should be noted that the Heras fencing currently surrounds the entire site with no access provision and therefore should not be secured with any permissions, an updated CEMP with amended drawing will be required prior to commencement of works. The

amended CEMP should also include a toolbox talk and all precautions and procedures that will be in place should dormice be encountered during works.

The LEMP is welcomed, particularly the proposed creation of habitat suitable for dormice along the haul route. To maximise the value of this habitat for the species, the planting scheme should incorporate additional dormouse-favoured species, including honeysuckle and bramble.

Whilst no direct impacts to existing dormouse habitat are now anticipated, the submitted LEMP does not currently include any proposals for the management or enhancement of retained dormouse habitat. Appropriate management of these retained areas would be expected to optimise habitat quality for dormice, particularly at the decommissioning stage, and the LEMP should be amended accordingly. It is noted that woodland enhancement is proposed with the BNG metric, the details of this should be included within the LEMP to demonstrate retention and enhancement of dormouse habitat.

In addition, although direct habitat loss is not proposed, there remains potential for indirect effects during construction and operation, including disturbance arising from noise, dust, and other activities. The LEMP does not currently provide sufficient detail on how retained dormouse habitat will be managed to minimise such impacts and maintain favourable conditions for the species throughout the lifetime of the development and beyond.

Furthermore, the submitted planting and management proposals only cover the first five years following establishment. Given the presence of this protected species, habitat management and maintenance should be secured in perpetuity to ensure the long-term retention and enhancement of suitable dormouse habitat. An updated LEMP should therefore be secured by planning condition to address these issues.

Notwithstanding the concerns outlined above, the measures set out within the LEMP, when read in conjunction with the CEMP, provide sufficient confidence that existing dormouse habitat can be retained and protected throughout the construction and operational phases of the development. Additional details relating to the long-term management and enhancement of retained habitat could reasonably be secured and submitted post-determination through an appropriately worded planning condition.

Ground nesting birds

A total of 3ha of habitat will be temporarily affected by the proposals which represents a small proportion of the land within the ownership. The active area has been subject to prolonged working and disturbance and therefore this extension is unlikely to significantly increase disturbance levels in the nearby area. It is noted that large areas have already been restored or are in the process of being restored which could form suitable dispersal habitat for any ground nesting birds impacted by these smaller scale proposals.

Habitats

No tree reductions or removals and no incursions into root protection areas are proposed. Operations are anticipated to be carried out in accordance with the Arboricultural Method Statement. Adherence to these recommendations must be provided in the form of a Construction Environment Management Plan (CEMP) with detailed mapping demonstrating the proposed exclusion areas and fencing to ensure protection of the retained vegetation. *It is noted that the arboricultural plan only relates to the northern parcel, where protection is required in the southern parcel, this should also be mapped and submitted in support of the CEMP.*

We welcome the restoration scheme submitted in support of the application and note the proposed scrub belt along the haul road which would provide functionally connected habitat for

dormice on site post operation. We note that these habitats are included within the metric for net gain and will be secured through an HMMP.

Habitat created to mitigate for the loss of habitat that currently supports protected species must be secured in perpetuity, in line with Core Policy 50 and therefore those areas to be retained and managed for protected species must be considered within a Landscape Ecological Management Plan (LEMP) in addition to those habitats created to achieve BNG. This LEMP should support the dormouse mitigation strategy and be submitted prior to determination for agreement with the LPA.

It is noted that '*Vegetation shown in the Existing Site Plan (David Jarvis Associates, August 2025) along the western boundary of this part of the quarry is outside the red line planning boundary and will be retained and protected with appropriate fencing*'. This information whilst welcomed is not reflected on site drawings and therefore should not be secured as part of this permission.

Mottisfont Bat SAC

The site lies 800m to the west of the 7.5km buffer zone for the Mottisfont Bat Consultation zone Special Area of Conservation. Due to the distance from the outer edge of the bat consultation zone and nature of the works which are proposing to retain boundary features, it is considered there will be no likely significant impact upon the SAC.

A test of likely significance has been 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). This concluded that given the scale and nature of the development combined with the separation between the SAC and the application site, there is no mechanism for adverse effect. **The HRA has concluded that the application is not likely to have significant impacts on the SAC and subsequently the application is screened out of Appropriate Assessment.**

New Forest protected sites: 13.8km Zone of Influence

The site lies within the New Forest Protected Sites. A test of likely significance has been 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). This concluded that given the scale and nature of the development there is no mechanism for adverse effect **The HRA has concluded that the application is not likely to have significant impacts on the SAC and subsequently the application is screened out of Appropriate Assessment**

River Test Catchment: Solent Maritime Special Area of Conservation (SAC), Chichester and Langstone Harbours Special Protection Area (SPA) and Ramsar site, Portsmouth Harbour SPA and Ramsar site, Solent and Southampton Water SPA and Ramsar site.

The site lies within the River Test Catchment and the underlying chalk at the site is a major regional aquifer supporting public water supplies. Surveys have revealed that groundwater flow is in a north-easterly direction towards the River Test, which passes 10km to the east of the site. It has been concluded that there will be no risk of intercepting the water table during the operational life of the quarry and therefore there are likely to be no significant impacts upon the protected site. It is noted that local groundwater levels will continue to be monitored via the installed boreholes on site.

A test of likely significance has been 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). This concluded that given the scale and nature of the development there is no mechanism for adverse effect **The HRA has concluded that the application is not likely to**

have significant impacts on the SAC and subsequently the application is screened out of Appropriate Assessment .

BNG

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 (Statutory Biodiversity Metric. August 2025. Georgie Starkie) confirming the baseline and predicted post- development biodiversity units of the site has been submitted. However, it would appear that the red line boundary and existing site plan do not align with the habitats included within the metric. The red line boundary and habitat types used for the BNG assessment must align with the development boundary and associated existing site plans. These issues must be addressed.

For clarification, the Existing Site Plan and Appendix 1: Habitat Map within the Ecological Report do not align. In particular, there are apparent inconsistencies relating to the vegetation within the southern parcel along the western boundary of the site. The Ecological Report identifies this area as a haul road and quarry area, whereas the Existing Site Plan indicates the presence of existing vegetation, a minerals processing area, and a soil storage area.

Furthermore, within the biodiversity metric, this area appears to have been mapped as *artificial unvegetated, unsealed surface*. However, available aerial imagery suggests that, although the land is disturbed, vegetation cover may exceed 10%. On this basis, it is unclear whether the area meets the criteria for classification under this habitat type.

Clarification is therefore required to resolve these discrepancies and to ensure consistency between the submitted plans.

Additional information has been submitted to clarify the vegetation in this area (Preliminary Ecological Appraisal and Ecological Impact Assessment. May 2026. Stark Ecology) however no maps have been amended to support/clarify this statement. These drawings should therefore not be secured as part of any permission granted as are not a reflection of the site according to the ecologists report.

Information in the completed on-site baseline habitat tabs is accepted as accurate based on the updated information submitted. The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	12.97 Habitat units
	0.00 Hedgerow units
	0.00 Watercourse units
Are there any <u>irreplaceable</u> habitats on-site?	No
Has any habitat <u>degradation</u> of occurred?	No

Note to case officer: The Existing Site Plan and Appendix 1: Habitat Map do not align. Confirmation of how the development will achieve BNG is a post-determination matter however consideration should be given to how any proposed BNG will be secured.

A Habitat Management and Monitoring Plan (HMMP) will be required, and should be secured via condition.

CONDITIONS:

1. The development will be carried out in strict accordance with the following documents:

- Restoration Scheme 3404-5-2. September 2025. David Jarvis Associates
- Arboricultural Impact Assessment and Method Statement. Wessex Woodland Management
- Statutory Biodiversity Metric. August 2025. Georgie Starkie
- IACPC. May 2026. Natural England
- DLL-ENQ-WILT-00143 Annex 3 Map. April 2026. Natural England

REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

2. Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, an updated Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:
- Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing with the inclusion of access.
 - Working method statements for protected/priority species, such as nesting birds and reptiles, including toolbox talks
 - Mitigation strategies already agreed with the local planning authority prior to determination, such as for great crested newts, dormice or bats; this should comprise the pre-construction/construction related elements of strategies only.
 - Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
 - Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

3. Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management to attain targets.

The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON:

To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

4. No development shall commence on site until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the statutory Biodiversity Gain Plan and including:
 - a non-technical summary;
 - the roles and responsibilities of the people or organisation(s) delivering the HMMP;
 - the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the statutory Biodiversity Gain Plan and schedule for implementation;
 - the management measures to maintain habitat in accordance with the statutory Biodiversity Gain Plan for a period of 30 years from the completion of development; and
 - the monitoring methodology and specification of a Monitoring Pack (to include but not exclusively up to date Management Actions Logs, Habitat Condition Assessment Reports, metric calculation; and corresponding post intervention Habitat Map) which shall be submitted to the Local Planning Authority in years 2 (two) 5 (five) 10 (ten) 15 (fifteen) 20 (twenty) and 30 (thirty) of the Maintenance Period,

has been submitted to, and approved in writing by, the local planning authority.

The created and/or enhanced habitat shall be managed and maintained in accordance with the statutory HMMP at all times thereafter.

REASON: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.

INFORMATIVES:

GCN

There is a residual risk that great crested newts / reptiles could occur on the application site. These species are legally protected and planning permission does not provide a defence against prosecution. In order to minimise the risk of these species occurring on the site, the developer is advised to clear vegetation during the winter, remove all waste arising from such clearance and maintain vegetation as short as possible. If these species are found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the Council Landscape and Design Team (ecologyconsultations@wiltshire.gov.uk)

Protected Species

The applicant should note that under the terms of the Wildlife and Countryside Act (1981) and the Conservation of Habitats and Species Regulations 2017 (as amended) it is an offence to

disturb or harm any protected species including for example, breeding birds and reptiles. The protection offered to some species such as bats, extends beyond the individual animals to the places they use for shelter or resting. Please note that this consent does not override the statutory protection afforded to any such species. In the event that your proposals could potentially affect a protected species you should seek the advice of a suitably qualified and experienced ecologist and consider the need for a licence from Natural England prior to commencing works. Please see Natural England's website for further information on protected species.

Nesting Birds

All British birds, their nests and eggs are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000 while birds are nesting, building nests and sitting on eggs. The applicant is advised to check any structure or vegetation capable of supporting breeding birds and delay removing or altering such features until after young birds have fledged. Damage to extensive areas that could contain nests/breeding birds should be undertaken outside the breeding season. This season is usually taken to be the period between 1st March and 31st August but some species are known to breed outside these limits

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date 13/07/2026
-------------------------	--------------------