

CASE OFFICER'S REPORT

Application Reference:	PL/2026/01038
Application Type:	Full planning permission
Consultation Ends:	21/07/26
Case Officer:	Joe Richardson

Site Address:	Langfords Car Spares, Semley, Shaftesbury, SP7 9AQ
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Proposal:	Change of use of part of the commercial yard from Sui Generis (car spares) to a self-storage facility, including the installation of 118 storage containers, widening of the site access, and the erection of security fencing with associated works
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Recommendation:	That Planning Permission be Granted
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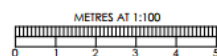
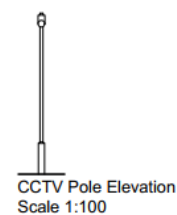
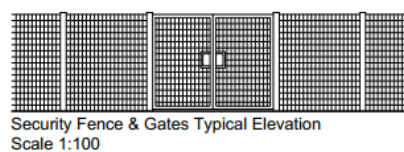
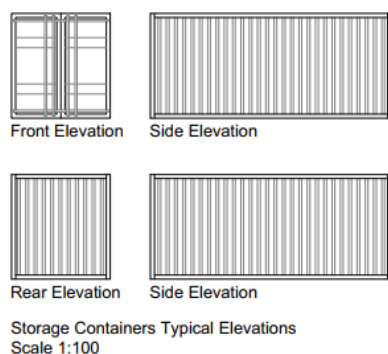
Site Description/Proposal:

The application site, Langford Car Spares is an established car breaking and recycling site situated adjacent to the A350 immediately south of Semley Station. The existing site extends to approximately 1.76ha of land of which approximately 0.6ha is proposed to be changed from its current use (storing and breaking cars for spares) to a site where metal containers are to be stationed for self-storage purposes.



The site is located on the outskirts of Semley. For the purposes of the local plan, the application site is classed as being within the open countryside. The breakers yard is located within the Cranborne Chase and West Wiltshire Downs National Landscape (CCNL); is within Flood Zone 1 and is in an area of land considered to be a negligible risk to groundwater flooding. To the north west of the site is the public footpath known as SESE48. To the north is the railway line known as the West of England main line that runs from London Waterloo to Exeter St Davids.

Planning permission is sought for the change of use of part of the commercial yard from Sui Generis (Car Spares/Breakers Yard) to a self-storage facility including the installation of 118 storage containers, widening of the site access and the erection of security fencing with associated works. The proposed site layout plan is shown below.



The proposed containers would be positioned at a single height and occupy land currently utilised for vehicle storage associated with the existing breaker's yard.

POLICIES

National Planning Policy Framework

Section 2 Achieving Sustainable Development

Section 11 Making Effective Use of Land

Section 12 Achieving Well Designed Places

Section 15 Conserving and enhancing the natural environment

Wiltshire Core Strategy

Core Policy 1 Settlement Strategy

Core Policy 2 Delivery Strategy
Core Policy 34 Existing Employment Land
Core Policy 50 Biodiversity and Geodiversity
Core Policy 51 Landscaping
Core Policy 52 Green Infrastructure
Core Policy 57 Ensuring high quality design and place shaping
Core Policy 60 Sustainable Transport
Core Policy 61 Transport and Development
Core Policy 64 Demand Management
Core Policy 67 Flood Risk

Supplementary Planning Documents:

Wiltshire Local Transport Plan 2015-2026: Car Parking and Cycling Strategy
Creating Places Design Guide SPD (April 2006)
National Design Guide 2021
Wiltshire Design Guide 2024

Cranborne Chase National Landscape Management Plan 2025-2030

Conservation of Habitats and Species Regulations 2017 (as amended)

Saved Salisbury District Local Plan
E19 – Employment in the Countryside

PLANNING HISTORY

S/1993/103 – Certificate of lawfulness for an existing use comprising of vehicle dismantling and scrap processing APP 05.05.93

S/2002/0193 – Erect Covered Breaking Yard APP 25.03.02

ISSUES

- Principle of development;
- Design, Landscape and Visual Impact including the CCNL and PROW;
- Amenity Impacts;
- Highway safety/parking;
- Ecological Impact including BNG;
- Flooding/Drainage

CONSULTATIONS/REPRESENTATIONS

Semley and Sedgehill Parish Council – No comments received

WC Highways – No objection subject to conditions with comments received stating:

I note the proposals seek to change the use of part of the existing car breakers yard/car parts yard and site 118 shipping containers for use as a self-storage site. I am also aware that the existing car parts yard will remain in operation on the remainder of the site, just on a smaller scale. The site is accessed directly from the A350, which is subject to a 50mph speed limit in this location. The submission has included visibility splays at the site access, which shows that 160m is available to the South and 129m to the North. As noted within the submission,

the Northern splay is below the desirable minimum standard stated in Design Manual for Roads and Bridges (DMRB), of 160m. The submission does correctly highlight that the absolute minimum of 120m would still be available, however, this is not ideal on a strategically important and busy rural route. Notwithstanding this, the submitted Transport Statement has assessed the overall traffic impact of the proposals using actual trip data from the existing site operations and a comparable self-storage site in Devon. Additionally, a letter is included from Self-Storage UK that supports the surveyed level of traffic in Devon. The TS thus concludes that the proposals would generate around 18-22 two-way vehicle trips per day. Alongside this, the TS assesses the impact of the overall reduction in the scale of the existing use and states that, on a percentage basis, this would reduce by around 9-14 two-way trips per day. The net impact of the proposals are thus considered by the TS to be in the region of 9 two-way trips per day. Whilst the comparison data from the Devon site is welcomed, this is only a single example and local conditions and users can vary. The information from Self-Storage UK is, whilst helpful, based on their 2021 report, which would have potentially still experienced the effects of COVID. The data from more recent annual reports has not been provided in this submission, despite annual reports being produced. The data is thus difficult to verify accurately given the small sample sizes and dates of surveys. I would have expected the submission to include a trip generation report from TRICS for the proposed use. Despite my concerns with the submitted data, I am aware that self-storage facilities, especially rurally located ones, do generate a modest level of traffic daily and that this traffic is generally outside of the peak highway periods. The likely impact of the proposals, given that the scale of the existing business will reduce significantly, is thus not considered to have a severe highway safety impact in this instance. The submission states that the existing access will be widened to 6.5m and security gates set back from the highway. The applicant is advised that the access widening may require a S.184 VX Licence, which they should discuss with the Area Highway Engineer.

Conditions/Informative(s) to be imposed:

The development hereby permitted shall not be first brought into use until the first 20m of the access, measured from the edge of the carriageway, has been consolidated and surfaced (not loose stone or gravel). The access shall be maintained as such thereafter.

REASON: In the interests of highway safety.

Notwithstanding the submitted details, the proposed development shall not be occupied until means/works have been implemented to avoid private water from entering the highway.

REASON: To ensure that the highway is not inundated with private water.

The proposed access gates shall be positioned a minimum of 20m from the edge of the carriageway and hung to open inwards only.

REASON: in the interests of highway safety,

No part of the development shall be first brought into use until the visibility splays shown on the approved plans have been provided with no obstruction to visibility at or above a height of 900mm above the nearside carriageway level. The visibility splays shall always be maintained free of obstruction thereafter.

REASON: In the interests of highway safety.

INFORMATIVE:

The application involves an extension to the existing/creation of a new vehicle access/dropped kerb. The consent hereby granted shall not be construed as authority to carry out works on

the highway. The applicant is advised that a licence will be required from Wiltshire's Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. Please contact our Vehicle Crossing Team on vehicleaccess@wiltshire.gov.uk and/or 01225 713352 or visit their website at <http://wiltshire.gov.uk/highways-streets> to make an application.

WC Public Protection – No objection subject to conditions with comments received stating:

On review of the information submitted, I understand that the proposal seeks to change the use of a parcel of land at Langford Car Spares from sui generis to Use Class B8 (self-storage facility).

I have considered the potential impact of the proposed development on residential amenity and set out my comments below. Please note, I have considered this application on the basis that the proposed development site is restricted to use as a self-storage facility only.

Noise:

The proposed development site is located approximately 20m from the nearest residential dwelling. The existing car spares business operates Monday to Friday 08:30–17:30 and Saturday 08:30–14:00. The proposed hours of operation for the self-storage facility are Monday to Friday 07:00–21:00 and Saturday to Sunday 08:00–20:00.

Self-storage facilities can generate intermittent noise associated with vehicle movements, loading and unloading, opening and closing of unit doors, and general customer activity. Without appropriate controls, this could result in adverse effects. The proposed extended hours, particularly during early mornings, evenings, and weekends, coincide with periods when background noise levels are typically lower. As such, they have the potential to give rise to increased disturbance to nearby residents. Given the close proximity of neighbouring residential properties, it is recommended that any permission granted is subject to conditions restricting the hours of operation. It is recommended that these restrictions closely align with the current opening times of the existing use, with no operation permitted on Sundays.

Lighting:

Given the close proximity of neighbouring residential properties, it is recommended that no external lighting be installed at the site other than that detailed within the submitted application.

Contaminated land:

We support the comments made by the Environment Agency in respect of contaminated land.

UPDATE:

No objection subject to conditions with comments received stating:

Following review of the additional information submitted, please find my comments below. As before, I have considered this application on the basis that the proposed development site is restricted to use as a self-storage facility only.

Noise:

Self-storage facilities are typically associated with intermittent and, at times, impulsive noise generation. Common sources include vehicle movements (engines starting, idling and revving, and car doors slamming), reversing alarms, the use of tail lifts during loading and unloading, opening and closing of storage unit doors, handling of metal chains and padlocks, and general customer activity across the site. Whilst not all units would be occupied or visited simultaneously, the proposed provision of 118 storage containers has the potential to generate

a significant number of daily trips and associated noise. In this respect, I share the concerns raised by the Highways Department regarding the limited value of the comparison data submitted within the Transport Statement. On review of our mapping system, it appears that there are several sensitive residential receptors to the North of the proposed development site. These are:

- Robins Folly located approximately 15 metres from the site boundary; and
- Nos. 1–3 Porters Cottages, with the nearest garden approximately 65 metres from the boundary and the closest dwelling approximately 70 metres away.

Whilst it is acknowledged that these properties are currently exposed to noise associated with the existing car spares business, it is important to note that this business operates Monday to Friday 08:30–17:30 and Saturday 08:30–14:00. By contrast, it is proposed that the self-storage unit is accessible Monday to Friday 07:00–21:00 and Saturday to Sunday 08:00–20:00. This represents a significant intensification. Operational noise from customers accessing the units is inherently difficult to predict, model, and control. For this reason, if the applicant considers that the proposed business cannot operate viably with restricted operating hours, I recommend that the application be refused.

Lighting and contaminated land:

Should you be minded to approve this application, my comments dated 20 May 2026 remain unchanged.

UPDATE:

Further to my comments dated 23 June 2026, which were submitted in respect of planning application PL/2026/01038, I understand that the Planning Department is minded to approve this application. If this is the case, I would recommend that a condition is attached restricting the business operating hours to 08:00 to 18:00, Monday to Sunday. This restriction would help ensure that local residents have some respite in the evening from any noise associated with the business activities and would minimise the potential for adverse impacts on residential amenity.

FURTHER UPDATE:

If the applicant would be willing to restrict customer access to the containers highlighted on the attached map to 08:00 and 18:00 daily, I think the following hours could be agreed for the other containers:

- 07:00 –18:00 Monday – Friday
- 08:00 – 18:00 Saturday and Sunday

WC Ecology – No objection subject to conditions. Please see full comments within the Ecological Impact section of this report. Conditions to be imposed:

Compliance with the submitted plans;
Construction Method Statement;
Enhancements for Biodiversity;

WC Landscape – Comments received stating:

Ecological Impact Statement states at para 7.3: Any future landscape planting should seek to enhance biodiversity, improve connectivity to the surrounding habitats and provide food and shelter for a wide range of wildlife. All amenity planting and formally landscaped areas should be designed using a variety of plant species beneficial for wildlife. These do not necessarily

have to be native but should be chosen for their ability to provide nectar or fruit and should be non-invasive species. There are a number of specialist seed mixes available specific to certain soil types, growing conditions and designed to benefit different groups of species such as bees or butterflies and moths.

BNG Assessment states at para 5.25:

18 native trees will be planted across the site. Tree species that may be planted may include but are not limited to; English oak *Quercus robur*, cherry *Prunus avium*, rowan *Sorbus subg. Sorbus*, silver birch *Betula pendula*, buckthorn *Rhamnus cathartica*, apple *Malus* sp, and lime *Tilia* sp. blackthorn *Prunus spinosa*, hawthorn *Crataegus monogyna*, hazel *Corylus avellana*, and dogwood *Cornus sanguinea*. The trees will be managed to a moderate condition. No planting plans have been included to reflect these aspirations and recommendations. It would be better to have this upfront rather than rely on conditions given the location in a NL.

UPDATE:

No objection with comments received stating:

Thank you for consulting the Landscape Team on the revised plan which now includes the proposed planting. While I don't have any specific objections to the proposals as they do represent an improvement to the scrapyard, the specification for the planting is small in size and could become overwhelmed by existing vegetation. Smaller planting can succeed if the applicant employs a rigorous maintenance regime keeping plants weed free and well-watered during the first 3-5 years during establishment.

WC Drainage: Objection with comments received stating:

The Drainage Team has a holding objection to the proposal. Further information should be submitted to satisfy drainage requirements.

UPDATE:

No objection subject to a condition requiring a surface water drainage strategy.

UPDATE:

No objection subject to the development being carried out in accordance with the submitted plans/details.

Environment Agency – No objection subject to a condition regarding contamination

WC Arbroicultural Officer – No objection subject to a condition with the following comments received:

No objection subject to trees being protected in accordance with the Arb Method Statement and Tree Protection Plan

Cranborne Chase National Landscape (CCNL) – Comments received with queries raised in regard of the following:

Light Pollution;

The potential opening hours are inappropriate;

The proposed number of containers is excessive;

Concerns the use of the storage containers could be for businesses, not just personal use;

Concerns about the protection of trees along the frontage of the site;
Inconsistencies between the Arbroicultural Report and the BNG report;
Lack of a landscaping plan;

UPDATE:

Comments received stating:

Thank you for letting us know you have received further information. However, the points raised in our earlier response do not appear to be addressed, and we have had no contact from the agent. Furthermore, the revised 'proposed site plan' is less than clear. The link from the site to the public highway on the eastern side of the site is still not shown, neither is that highway. There is no key for the green symbols, presumably meant to represent trees, and it is unclear whether they are simply diagrammatic or represent an accurate location of existing trees. The latter should, of course, be what is provided for a proposal a sensitive NL, landscape. In addition the notes refer to planting 18 trees but there only appear to be 12 shown on the plan. A proper landscape plan is needed, prepared by an appropriately qualified landscape professional. That should include the current situation plus the proposals and specification. For clarity that should be two documents, existing and proposed, and should show the highway on the eastern side.

Third party representations –

1 x letter of concern with comments received stating:

What effect will this have on the people who live in porters cottages. There is already a small drive full of cars for access. Will it affect that or will it all be round the back.

2 x letters of support with comments received stating:

I am the business owner operating from 'Robin's Folly'. The proposed change of use from a breakers yard to a self-storage facility wouldn't be detrimental to my business operation or my personal enjoyment of the house and its surroundings. In fact in many ways the change would be much better for me:

- Down my drive and the entrance gate would be see the removal of scrap vehicles which are currently very visible when you arrive at the entrance to my driveway.
- The view when looking out from my premises would be significantly improved - lowering the height of the items in the yard and making it much neater and tidier.
- Noises associated with the breakers yard would be moved further away from our boundary. Having personally used container self-storage sites for much of my life I've not found them to be either busy or noisy.
- The initial proposed opening hours on the application would have caused me no concerns for my business or my enjoyment of the garden and surroundings.

The opening hours requested by Karl (07:00 till 19:00 weekdays and 20:00 till 18:00 weekends) would be even less intrusive than the existing site and would make any sound more predictable. I very rarely hear anything from the yard as it is but I have noticed sounds outside of those hours before. I've never been bothered by it.

I am writing to you with reference to planning application PL/2026/01038, submitted by my Brother, Karl Langford and Uncle, Paul Langford for the change of use of part of their breakers yard which borders my property, Robin's Folly. I understand that there are concerns from

Public Protection about the proposed opening times. The house is currently leased to my tenant, Greg Manning, who is operating a retreat business there. I would like to confirm that I have no concerns about the proposed operating hours of 0700 - 1900 weekdays and 0800 - 1800 weekends, nor do I have any concerns regarding noise issues from the proposed self-storage business. I would consider the change of use as favourable to both myself and my future tenants. It would look nicer and be quieter than the current scrap yard.

ASSESSMENT

Principle of development

At the heart of the NPPF is a presumption in favour of sustainable development and the Settlement and Delivery Strategies of the Core Strategy are designed to ensure new development fulfils the fundamental principles of sustainability. This means focusing growth around settlements with a range of facilities, where local housing, service and employment needs can be met in a sustainable manner. A hierarchy has been identified based on the size and function of settlements, which is the basis for setting out how the Spatial Strategy will deliver the levels of growth.

Core Policy 1 of the Wiltshire Core Strategy sets out the 'Settlement Strategy' for the county, and identifies four tiers of settlement - Principal Settlements, Market Towns, Local Service Centres, and Large and Small Villages. Only the Principal Settlements, Market Towns, Local Service Centres and Large Villages have defined limits of development/settlement boundaries.

Core Policy 2 of the Wiltshire Core Strategy sets out the 'Delivery Strategy'. It identifies the scale of growth appropriate within each settlement tier, stating that within the limits of development, as defined on the policies map, there is a presumption in favour of sustainable development at the Principal Settlements, Market Towns, Local Service Centres and Large Villages.

Core Policy CP34 of the WCS states:

Outside the Principal Settlements, Market Towns and Local Service Centres, developments that :

- Are adjacent to these settlements and seek to retain or expand businesses currently located within or adjacent to the settlements; or*
- Support sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification; or*
- Are for new and existing rural based businesses within or adjacent to Large and Small Villages; or*
- Are considered essential to the wider strategic interest of the economic development of Wiltshire, as determined by the council will be supported where they;*
- Meet sustainable development objectives as set out in the policies of this Core Strategy; and*
- Are consistent in scale with their location, do not adversely affect nearby buildings and the surrounding area or detract from residential amenity; and*
- Are supported by evidence that they are required to benefit the local economic and social needs; and*
- Would not undermine the delivery of strategic employment allocations;*
- Are supported by adequate infrastructure*

Also of relevance is saved policy E19 of the Salisbury District Local Plan (SDLP) that states:

Except within the New Forest Heritage Area, proposals to redevelop or enlarge existing employment sites in the countryside will be permitted where the proposed development would take place within the existing boundaries of the site. Proposals involving land outside established boundaries will be considered if;

- (i) the proposal would result in improved local employment opportunities;
- (ii) the proposal will improve the operational efficiency of the enterprise;
- (iii) there is no suitable alternative building in the immediate locality;
- (iv) there is no adverse impact on the character of the surrounding landscape or biodiversity;
- (v) there is no unacceptable increase in vehicular traffic or additional reliance on the private car; and
- (vi) the environment of any nearby dwellings will not be adversely affected.

Paragraphs 88 and 89 of the NPPF state:

88. Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;
- b) the development and diversification of agricultural and other land-based rural businesses;
- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

89. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

The application relates to an existing commercial employment site rather than the creation of a new business use (self-storage facility) within the open countryside. The proposal would diversify an established rural business that has been in operation as a breakers yard through the introduction of self-storage facilities within part of the operational yard.

Comments received from the CCNL are duly noted and have been carefully considered. Queries have been raised in regard to whether the proposed self-storage use requires a rural location and whether the number of containers has been justified. Whilst these comments are noted, neither national nor local planning policy requires an applicant to demonstrate an overriding need for a commercial development of this nature. The proposal relates to the diversification of an existing lawful employment site and should primarily be assessed against its impacts rather than whether an alternative location may exist. Core Policy CP34 of the WCS supports the expansion and diversification of existing rural businesses where environmental impacts are acceptable.

As outlined, Core Policy 34 supports employment development associated with the expansion and diversification of existing businesses in rural areas where proposals are appropriately located and do not result in unacceptable impacts. The proposal utilises previously developed land within an established commercial site and would support continued economic activity and employment.

Whilst the site lies outside a Principal Settlement, Market Town or Local Service Centre, the proposal is considered to represent diversification of an existing business rather than isolated new employment development. Having regard for the outlined paragraphs of the NPPF, specifically 88 and 89 and the relevant planning policies of the Wiltshire Core Strategy, the principle of this development proposal is therefore considered acceptable, subject to assessment of detailed impacts around design, landscape and visual impacts, neighbouring amenity, highway safety, ecological impacts and drainage.

Design, Landscape and Visual Impact including the CCNL and PROW

Core Policy 57 aims to achieve a high standard of design in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complimentary to the locality. The revised NPPF puts greater emphasis on the need for good design. Paragraph 135 sets out that developments should function well and add to the overall quality of the area; demonstrate good architecture, layout and appropriate and effective landscaping; be sympathetic to local character; and establish a sense of place. It states at Paragraph 139 that development that is not well designed should be refused.

Core Policy CP51 of the WCS which states:

Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall demonstrate that they have taken account of the objectives, policies and actions set out in the relevant Management Plans for these areas.

Paragraph 189 of the NPPF states '*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited*'.

The proposed layout is designed within an existing operational yard area and in officer opinion represents an efficient re-use of previously developed land without extending the commercial site beyond the existing established boundaries. The self-storage compound is contained within an area already used for vehicle storage and is positioned away from the A350 public highway. The arrangement of the storage containers shows units grouped in rows around internal circulation routes. This layout should facilitate vehicle manoeuvring and customer access whilst maintaining functional separation from the remainder of the vehicle recycling operation. The proposed 2.4m security fencing clearly defines the self-storage area and provides operational control of the site.

From a landscape perspective, the layout benefits from the retention of the substantial existing tree belt surrounding the site. The containers are positioned away from the site boundaries and are contained within a heavily screened part of the yard. Existing vegetation is therefore relied upon as a mitigation measure for visual impact within the Cranborne Chase National Landscape.

The site is undoubtedly sensitive given its location within the Cranborne Chase National Landscape. However, it is also important to acknowledge the existing character of the application site, which comprises an established vehicle dismantling and storage operation containing stacked vehicles, hardstanding, fencing and associated infrastructure. The proposal occupies part of this existing yard and does not extend development into undeveloped land. The submitted plans indicate that the storage compound would be enclosed by substantial existing mature vegetation and tree belts which already provide screening from the wider landscape. The proposed containers would be a single unit in height and would replace areas currently used for vehicle storage. Each container will be a RAL 6007 bottle green colour and the security fencing is to be finished in RAL 6005 (moss green). Consequently, with the colouring of the proposed storage containers and security fencing as proposed, officers consider that the development would not introduce a materially greater degree of visual intrusion than the existing lawful use.

Officers acknowledge that comments have been raised regarding the number of replacement trees (18) are inconsistent within the submitted documentation. However, the submitted location plan shows 18 trees to be planted. Comments received from the Council's Arbroicultural Officer raise no objection to this scheme subject to the existing trees being protected in accordance with the submitted Arbroicultural Method Statement and Tree Protection Plan.

Further comments around lighting in light of the site being within the Dark Skies Reserve, a condition requiring a lighting strategy demonstrating compliance with the relevant Environmental Zone standards (E0) can be imposed onto any consent.

The development is confined to an existing commercial yard, retains substantial existing screening, reuses previously developed land, would not have any impact to the adjacent PROW SESE48 and subject to the imposition of planning conditions, adheres with the requirements of Core Policies CP51 and CP57 of the WCS.

Amenity Impacts

Core Policy 57 of the WCS also requires that development should ensure the impact on the amenities of existing occupants is acceptable, and ensuring that appropriate levels of amenity are achievable within the development itself, and the NPPF (paragraph 135f) states that planning decisions should 'create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.'

The proposal is located within an established commercial site. The self-storage use is not anticipated to generate significant noise, disturbance or activity beyond that already associated with the lawful commercial operation. The nearest residential properties known as No's 1-3 Porters Cottage are separated from the storage area by an approximate distance of

90 metres and are separated by existing site activities and landscaping. Another building known as Robins Folly is approximately 20 metres from the site. Officers note that this building was recently granted planning permission for the change of use from a C3 dwellinghouse to a mixed use C3 and C1 Guest House for residential retreats although it is not known if this use has commenced.

The comments from the received from the member of the public to this proposal are duly noted. Officers also note comments received from the Council's Public Protection Team have raised concerns regarding the potential for noise arising from the operation of 118 self-storage units, particularly from vehicle movements, loading and unloading activities, and customer visits outside the operating hours of the existing car spares business. These concerns have been carefully considered. However, officers note that the proposed development is not located on a previously quiet site but within an established commercial vehicle dismantling and recycling yard that already generates vehicle movements, customer visits, deliveries, dismantling activities and associated operational noise. The proposal would utilise part of an existing operational yard rather than extend commercial activity into a new location.

Whilst noise associated with self-storage facilities can arise intermittently from customer activity, there is no substantive evidence before the Council demonstrating that the proposed use would result in noise levels that would materially exceed those associated with the existing lawful use of the site. Indeed, the submitted Transport Statement estimates relatively low levels of activity, with approximately 11 arrivals and 11 departures per day. Although Public Protection questions the robustness of this comparison, no quantitative noise assessment has been provided which demonstrates unacceptable harm to residential amenity.

Officers also note that self-storage operations are generally characterised by sporadic and short-duration visits rather than continuous operational activity throughout opening hours. The proposed use does not involve manufacturing processes, vehicle repair operations, external plant machinery or regular HGV servicing activities. As such, the nature of the proposed activity differs from forms of commercial development typically associated with sustained noise generation. Furthermore there are limited lighting levels proposed around the site and no containers or lighting are to be sited within the corner of the site immediately adjacent to the property known as Robins Folly.

The application proposes operating hours for the self-storage facility of 07:00-21:00 Monday to Friday and 08:00-20:00 on Saturdays and Sundays.

Concerns have been raised by the Council's Public Protection Officer regarding the potential amenity impacts arising from these proposed hours. In response, the applicant has advised that more restrictive hours would undermine the viability and operation of the business, as customers often require access outside conventional working hours. However, no substantive evidence has been provided to justify the extent of the proposed operating hours beyond reference to a similar self-storage facility in Devon.

Following further discussions between officers, the Council's Public Protection Officer suggested the following compromise hours:

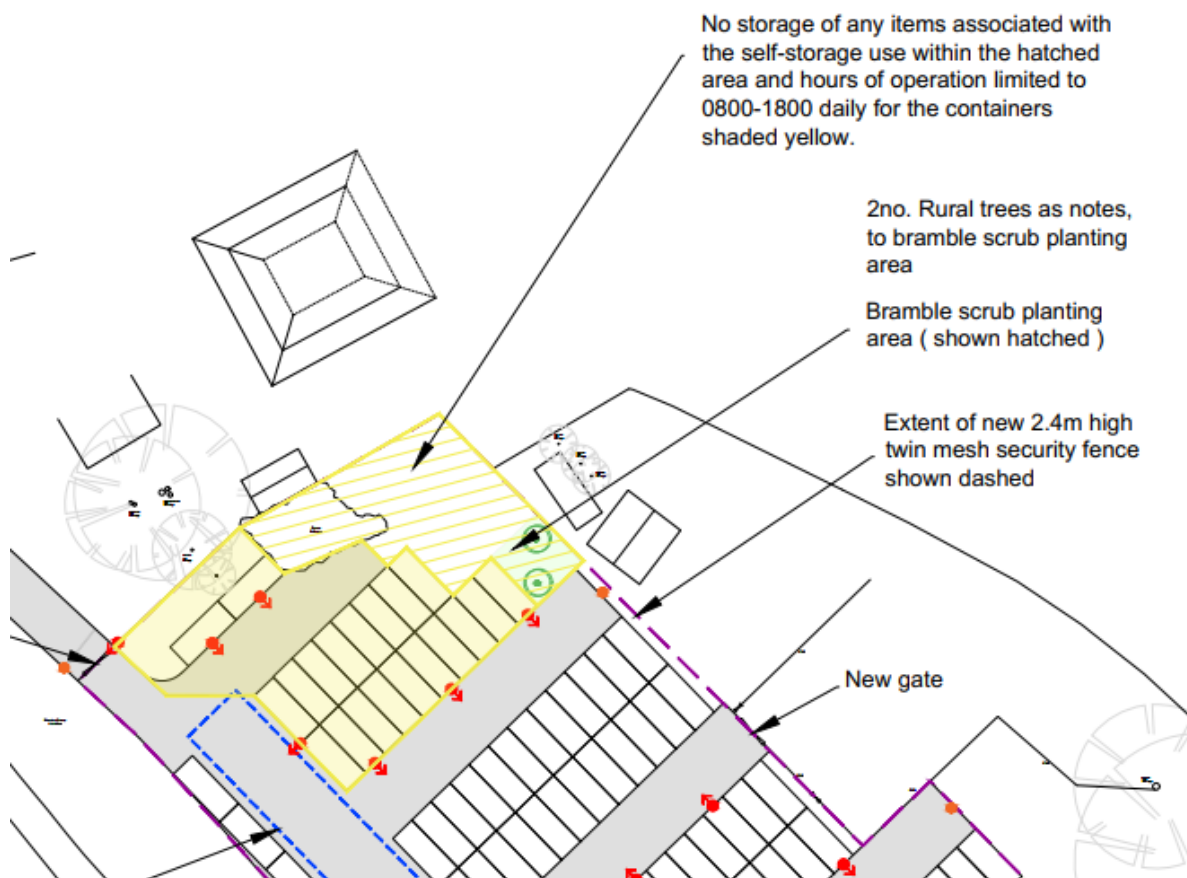
- 07:00-18:00 Monday to Friday; and
- 08:00-18:00 Saturdays and Sundays.

These comments are noted and have been taken into account. However, in assessing the proposal, officers (in their role as the determining authority) have also had regard to the site's existing lawful unfettered use as a vehicle breakers yard. Such an unfettered use has the potential to have an adverse impact on the general amenities of the area, due to the general noise and disturbance which could result from such a use. This is of significant weight in the overall balance as the site is located close to a number of residential properties, as well as being located in a designated National Landscape.

In comparison to the unfettered use of the site, the proposed self-storage use is not considered to have so much potential to adversely affect the general amenities of the area, particularly considering it is capable of being adequately controlled through planning conditions and is likely to result in a reduction in noise, disturbance, odour and visual impacts when compared with the existing unrestricted use of the site.

On balance, officers consider it reasonable to restrict customer access to the self-storage compound to 07:00-19:00 Monday to Friday and 08:00-18:00 on Saturdays and Sundays. In addition, to safeguard the amenity of the nearby dwelling known as Robins Folly, a condition is proposed restricting customer access to the 20 storage containers closest to that property to between 08:00 and 18:00 on any day. A further condition will require the area immediately adjacent to Robins Folly to remain free from the storage of any items associated with the self-storage use.

These measures have been discussed and agreed with the applicant's agent. An amended site layout plan has been submitted identifying the area where no self-storage items may be stored (hatched yellow) and the group of 20 containers subject to the additional access restriction (shaded yellow). An extract from this plan is shown below.



In considering whether refusal could be justified on amenity grounds, officers have had regard to Core Policy 57 of the Wiltshire Core Strategy, which seeks to ensure that development does not result in unacceptable impacts on neighbouring occupiers. Whilst the concerns raised by the Public Protection Officer are acknowledged, the existing unfettered use of the site as a breakers yard is a significant material consideration. Officers consider that the proposed self-storage use represents an improvement over the existing use in terms of noise, odour, activity levels and visual appearance, and is a public benefit of the proposal. Accordingly, subject to the recommended conditions restricting customer access and storage activities adjacent to Robins Folly, the proposal would not result in significant harm to residential amenity and does not warrant refusal on those grounds.

Furthermore, the existing commercial character of the site, the limited forecast traffic generation, and the proximity of the A350 and railway corridor are all material considerations weighing in favour of the proposal. Accordingly, officers do not consider that a refusal reason based on noise and disturbance could be justified.

Comments in respect of Land Contamination received from the Council's Public Protection Team and the Environment Agency are duly noted. A condition as outlined by the Environment Agency in regard to a remediation strategy should any contamination be found within the site can be imposed onto any consent.

Highway safety/parking

Core Policy CP61 of the WCS seeks to ensure development provides safe access and does not unacceptably impact the highway network.

The site benefits from an existing access/egress obtained from the A350. There is an existing rear access gate to the site but this is not proposed to be utilised by way of this proposal. A Transport Statement accompanies the application and indicates that the proposal would generate approximately 11 vehicle trips in and 11 vehicle trips out per day. The proposed access widening from the site entrance would improve manoeuvrability and access arrangements from/to the A350.

The full comments from the Highways Officer to this proposal are detailed within the consultee response section of this report.

The Council's Highway Officer has expressed some reservations regarding the robustness of the submitted trip generation evidence in that the comparison is based only on one self-storage site; the self-storage data is derived from a 2021 report which may have been influenced by Covid-19 restrictions and more recent industry data has not been provided.

However, despite these concerns, the Council's Highways Officer acknowledges that self-storage facilities generally generate relatively low levels of traffic, particularly in rural locations, and that visits tend not to coincide with peak traffic periods.

Accordingly, it is concluded that, given the modest traffic likely to be generated and the reduction in the scale of the existing business, the proposal would not result in a severe impact on highway safety. Therefore, no highway objection is therefore raised subject to the imposition of the suggested conditions and informatives as outlined within the consultee response. Subject to the imposition of the suggested conditions, officers consider the proposal adheres with the requirements of Core Policy CP61 of the WCS.

Ecological Impact including BNG

CP50 and CP52 of the Wiltshire Core Strategy and the National Planning Policy Framework require that the planning authority ensures protection of important habitats and species in relation to development and seeks enhancement for the benefit of biodiversity through the planning system. It will therefore be necessary to assess the site for its potential to support habitats and species of importance to nature conservation.

Comments received from the Council's Ecologist state the following:

Information considered:

- Ecological Impact Assessment, Darwin Ecology, October 2024
- Biodiversity Net Gain Assessment, Darwin Ecology, November 2025
- Condition Assessment Sheets, Jonathan Bayliss
- Statutory Biodiversity Metric, Nathan Biggs, November 2025
- Cover Letter and Planning Statement, Brimble Lea, February 2026
- Proposed Site Plan, Brimble Lea, April 2024, Rev F
- 'Proposed Lighting Details' and copy of email [25/03/2026] containing lighting scheme, uploaded April 2026

The site comprises a car recycling site where it is proposed to create a self-storage facility, involving the widening of site access, installation of storage containers and new fencing. The site is bordered by woodland to the southeast and northeast, connecting to grassland fields and woodland patches further beyond.

COMMENTS:

Protected species and habitats

Background

A walkover survey was conducted in June 2024, and visited again in November 2025. The site contains sparsely vegetated urban land (stone chippings) and bramble scrub along the fenceline. Along the road verge at the site entrance there is a section of modified grassland.

Bats

There are no structures within the site suitable for use by roosting bats. Nonetheless, the ecology report recommends a toolbox talk from a licensed bat ecologist, prior to the clearance of any stored cars. The report's recommended mitigation should be secured via condition.

The site is bordered by woodland to the southeast and northeast, connecting to grassland fields and woodland patches further beyond. The surrounding landscape therefore provides good foraging and commuting opportunities for bats. The proposed lighting scheme comprises warm light temperatures and directional fittings that face away from the site boundaries. The Proposed Site Plan, showing the lighting layout, should be secured via condition.

Great Crested Newts (GCN)

Habitat Suitability Index assessments were undertaken of all ponds within 500m of the site. In particular, there was one pond 35m north of the site boundary, but this was found to be of below average suitability for use by GCN. The site itself arguably contains habitats of negligible value for amphibians. The ecology report recommends the submission of a Construction Environmental Management Plan (CEMP) to include precautionary measures for GCN. Given the scale of this application and habitats to be impacted, a full CEMP is not considered necessary, but a *Construction Method Statement (CMS)* is recommended to be secured via condition.

Other

The CMS should also detail precautionary measures for badgers, nesting birds and reptiles. Further, it must include measures to ensure the surrounding woodland remains protected from impacts such as dust, noise and light pollution during the construction phase. This is because much of the woodland connects to Semley Common County Wildlife Site (CWS) as well as Coppit Dennis CWS, containing areas of ancient woodland.

In line with the NPPF and CP50, gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. As such, ecological enhancements, whether achieved via BNG or otherwise, should be secured via a condition. The ecology report's suggestions of bat boxes are welcomed.

Biodiversity Net Gain

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, condition assessments and map ('*Biodiversity Net Gain Assessment, Darwin Ecology, November 2025*'; '*Statutory Biodiversity Metric, Nathan*

Biggs, November 2025) confirming the baseline and predicted post-development biodiversity units of the site have been submitted.

The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	0.67 Habitat units
	0.00 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

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. It is proposed to achieve a net gain by creating new scrub and planting 18 trees.

Comments as outlined above from the Council's Ecologist raise no objection to this scheme subject to the imposition of conditions regarding compliance with the submitted plans and documentation; the provision of a Construction Method Statement and; enhancements for biodiversity. Subject to the imposition of the suggested conditions, officers consider the proposal adheres with the requirements of Core Policy CP50 of the WCS and would deliver the necessary biodiversity net gain for the site.

Flooding/Drainage

In planning terms, flood risk refers to the potential for development to increase the likelihood or severity of flooding on-site or elsewhere, while drainage considerations relate to the capacity of the site and surrounding infrastructure to manage surface water runoff in a sustainable and effective manner. The Local Planning Authority must be satisfied that the proposed development will not increase flood risk, either on-site or elsewhere, and that surface water will be managed in a sustainable and coordinated manner. Where necessary, planning conditions or legal agreements may be used to secure the implementation, maintenance, and monitoring of SuDS and other drainage infrastructure.

The application was initially subject to a holding objection from the Council's Drainage Team due to concerns raised regarding the proposed surface water drainage strategy, including the absence of sufficient information relating to runoff rates, the drainage hierarchy, water quality treatment, exceedance flow routes, the effect of the proposed impermeable liner, and the capacity of the receiving ditch network. Further information was requested to demonstrate that the development would not increase flood risk on or off site and would accord with sustainable drainage principles.

Following the submission of additional drainage information, including revised calculations, exceedance flow plans and technical clarification, the Council's Drainage Team confirmed that the majority of its concerns had been satisfactorily addressed.

Having reviewed the additional information, the Council's Drainage Team confirmed that all outstanding drainage matters had been satisfactorily addressed and have no withdrawn the previous objection. Comments confirm that the development with the proposed drainage strategy would provide attenuation and controlled discharge rates significantly lower than

existing site conditions, without increasing flood risk elsewhere. Accordingly, officers are satisfied that the proposal adheres with the requirements of Core Policy 67 of the Wiltshire Core Strategy.

Planning Balance/Conclusion

The proposal seeks full planning permission for the change of use of part of the commercial yard from Sui Generis (Car Spares/Breakers Yard) to a self-storage facility including the installation of 118 storage containers, widening of the site access and the erection of security fencing with associated works.

The proposal would be located entirely within the confines of an established employment site and would not result in the expansion of the site into undeveloped countryside. The development would make productive use of previously developed land, support the rural economy and accord with the objectives of Core Policy 34, which supports the expansion and diversification of existing businesses in rural areas. The proposal is also consistent with national policy which supports economic growth and business diversification in rural locations.

The proposal has generated concerns relating to its location within the Cranborne Chase National Landscape. These concerns are acknowledged and great weight has been given to the statutory duty to conserve and enhance the natural beauty of the designated landscape. However, the development would be contained within an existing commercial yard already characterised by vehicle storage, hardstanding and associated operational activity. The site benefits from substantial established boundary vegetation and mature trees which provide significant visual containment. Furthermore, the development replaces areas currently used for vehicle storage with single-height containers and does not extend the developed footprint of the site. Subject to landscape mitigation and retention of existing screening, the development is not considered to result in unacceptable harm to landscape character or scenic beauty.

The Council's Highways Officer acknowledges limitations in the submitted trip generation evidence but accepts that self-storage facilities typically generate low levels of traffic. Taking account of the reduction in the scale of the existing car spares operation, it is concluded that the proposal would not result in a severe impact on highway safety or the operation of the local highway network. The proposed access widening also represents a modest improvement to the existing access arrangements.

With regard to residential amenity, concerns have been raised by Public Protection regarding the potential for noise associated with customer activity and the proposed opening hours. Whilst these concerns carry weight, the proposal must be considered in the context of the existing lawful unfettered commercial use of the site. The evidence available does not demonstrate that the proposed use would give rise to unacceptable levels of noise or disturbance sufficient to justify refusal, particularly given the limited trip generation forecasts, the distances to neighbouring dwellings, and the proximity of the A350 and railway line. A condition restricting customer access hours to the site; to the 20 storage containers and area

of land immediately adjacent to the dwelling known as Robins Folly can appropriately mitigate potential impacts.

Overall, the proposal would deliver economic benefits through the diversification of an existing rural business and the effective reuse of previously developed land. The identified impacts relating to landscape character, residential amenity, highways and drainage are not considered to be so significant as to outweigh those benefits, particularly when appropriate planning conditions can be imposed around ecology, landscaping, land contamination, drainage and hours of operation.

Accordingly, having regard to the development Plan as a whole, the proposal is considered to accord with Core Policies 34, 50, 51, 57, 61 and 67 of the Wiltshire Core Strategy, saved policy E19 of the Salisbury District Local Plan and guidance with the NPPF. The application is therefore recommended for approval subject to conditions.

RECOMMENDATION

That planning permission be granted subject with the following conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans:

DWG No: 23091-4 Rev C Site Location Plan Date Received 13.02.26

DWG No: 23091-3 Rev J Proposed Site Layout/Landscaping Plan Date Received 30.07.26

DWG No: 80757-04 Rev C Proposed Surface Water Drainage Strategy Date Received 06.07.26

DWG No: 80757-12 Existing Impermeable Area Date Received 06.07.26

Covering Letter with Runoff Rates from Such Salinger Peters Ltd Dated July 2026 Date Received 06.07.26

DWG No: 80757-07 Existing Exceedance Flows Date Received 18.06.26

DWG No: 80757-09 Existing Offsite Overland Flow Date Received 18.06.26

DWG No: 80757-08 Proposed Exceedance Flows Date Received 18.06.26

DWG No: 80757-10 Proposed Offsite Overland Flow Date Received 18.06.26

DWG No: 80757-01 Drainage Survey Date Received 13.02.26

Flood Risk Assessment undertaken by Such Salinger Peters Ltd Dated February 2026 Date Received 13.02.26

Surface Water Calculations undertaken by Such Salinger Peters Ltd Date Received 13.02.26

Drainage Strategy Report undertaken by Such Salinger Peters Ltd Issue 3 Dated February 2026 Date Received 20.02.26

Transport Statement undertaken by Bellamy Transport Consultancy Dated January 2026 Date Received 20.02.26

Maintenance Schedule undertaken by Such Salinger Peters Ltd Date Received 20.02.26

Arbroicultural Method Statement & Tree Protection Plan undertaken by NBTree Management Dated February 2026 Date Received 20.02.26

Ecological Impact Assessment undertaken by Darwin Ecology Dated 2024 Date Received 13.02.26

Proposed Lighting Details Date Received 21.04.26

Biodiversity Net Gain Assessment undertaken by Darwin Ecology Dated November 2025 Date Received 13.02.26

Biodiversity Metric Condition Assessment Date Received 16.02.26

Biodiversity Net Gain Metric Date Received 21.04.26

Biodiversity Net Gain Assessment Date Received 13.02.26

Contamination Statement Dated April 2026 Ref: DC/23091 Date Received 22.04.26

REASON: For the avoidance of doubt, in the interests of proper planning and for the protection, mitigation and enhancement of biodiversity.

3. The self-storage use hereby permitted shall comprise no more than 118 storage containers at any time. No additional containers, storage units, buildings or structures associated with the self-storage use shall be stationed, erected or placed within the application site.

All storage containers shall be finished and thereafter retained in RAL 6007 (Bottle Green). No container shall exceed 2.6 metres in height above adjacent ground level and containers shall not be stacked. The approved security fencing shall be finished and thereafter retained in RAL 6005 (Moss Green).

REASON: To define the scope of the permission, to prevent the over-intensification of the self-storage use, to safeguard the character and appearance of the CCNL, and to ensure the development remains compatible with the operation of the adjoining vehicle dismantling business.

4. No customer access, movement of vehicles, trailers and containers into and out of the approved storage container yard, or manoeuvring within the storage container yard as shown within approved plan DWG No: 23091-3 Rev J shall take place outside of the hours of 07:00-19:00 Monday to Friday and 08:00-18:00 Saturday and Sunday.

REASON: In the interests of residential amenity.

5. Notwithstanding the approved hours of operation for the wider self-storage facility, customer access to the 20 storage containers identified on approved plan DWG No: 23091-3 Rev J (shaded in yellow) shall be limited to the hours of 08:00 to 18:00 on any day.

Furthermore, the area identified hatched in yellow on approved plan DWG No: 23091-3 Rev J adjacent to the dwelling known as Robins Folly shall be kept permanently clear of any containers, vehicles, goods, materials, equipment or other items associated with the self-storage use and shall not be used for external storage purposes at any time.

REASON: In the interests of residential amenity.

6. None of the containers sited/stored on the site subject to this development hereby permitted shall have any refrigeration or other powered plant running outside the permitted hours of use of the site under conditions 4 and 5 above.

REASON: In the interests of amenity of the nearby residential properties.

7. Any contamination that is found during the course of construction of the development hereby approved that was not previously identified shall be reported immediately to the Local Planning Authority. Development on the part of the site affected shall be suspended until a risk assessment has been carried out and submitted to and approved in writing by the Local Planning Authority. Where unacceptable risks are found, the development shall not resume or continue until remediation and verification schemes have been carried out in accordance with details that shall first have been submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

8. No development shall commence on site (including any vegetation removal or works to existing structures) until a Construction Method Statement has been submitted to, and approved in writing by the Local Planning Authority. The Construction Method Statement shall include all precautionary measures to be implemented during the construction period, for the protection of sensitive habitats and species known to be present within or adjacent to the site, with particular reference to the woodland, bats, great crested newts, badgers and nesting birds. The development shall be carried out in strict accordance with the approved Construction Method Statement.

REASON: To ensure adequate protection, mitigation and compensation for protected species and priority habitats.

9. Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of ecological enhancement features including bat boxes, refugia or invertebrate blocks, shall be submitted to the Local Authority for approval. The approved details shall be implemented for the lifetime of the development and before completion of the final works.

REASON: To provide mitigation /enhancement for biodiversity.

10. The development hereby permitted shall not be first brought to use until the first 20 metres of the access, measured from the edge of the carriageway has been consolidated and surfaced (not loose stone or gravel). The access shall be maintained as such thereafter.

REASON: In the interests of highway safety.

11. The proposed access gates shall be positioned a minimum of 20 metres from the edge of the carriageway and hung to open inwards only.

REASON: In the interests of highway safety.

12. No part of the development shall be first brought into use until the visibility splays shown on the approved plans have been provided with no obstruction to visibility at or above a height of 900mm above the nearside carriageway level. The visibility splays shall always be maintained free of obstruction thereafter.

REASON: In the interests of highway safety.

13. Notwithstanding the submitted details, the proposed development shall not be occupied until means/works have been implemented to avoid private water from entering the highway.

REASON: To ensure that the highway is not inundated with private water.

14. The external lighting to be installed across the site shall be in accordance with approved plan: Proposed Lighting Details and shall be designed and implemented to minimise sky glow, glare and light trespass. The external lighting shall be installed in a downward facing position at all times and shall not face towards adjacent residential properties and shall meet the criteria for Environmental Zone E0 as defined by the Institute of Lighting Professionals 'Guidance Notes for the Reduction of Obtrusive Light' 2021. The external lighting installed at the site shall be retained and maintained as such thereafter for the lifetime of the development.

REASON: To ensure appropriate levels of adjacent residential amenity are achieved and; to protect the Dark Skies Reserve.

15. All soft landscaping as shown on approved plan DWG No: 23091-3 Rev J shall be carried out in the first planting and seeding season following the first occupation of the dwelling or the completion of the development whichever is the sooner; All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees, hedgerow or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority. All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

REASON: To ensure a satisfactory landscaped setting for the development.

16. The CCTV cameras shown on approved plan DWG No: 23091-3 Rev J shall be orientated so as not to face towards (at any time) the adjacent residential dwelling and curtilage known as Robins Folly, Semley Hollow, Semley, SP7 9AQ.

REASON: To protect residential amenity.

INFORMATIVE TO APPLICANTS

1. The application involves an extension to the existing/creation of a new vehicle access/dropped kerb. The consent hereby granted shall not be construed as authority to carry out works on the highway. The applicant is advised that a licence will be required from Wiltshire's Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. Please contact our Vehicle Crossing Team on vehicleaccess@wiltshire.gov.uk and/or 01225 713352 or visit their website at <http://wiltshire.gov.uk/highways-streets> to make an application.
2. The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition)" that the development may not begin unless:
 - a) a Biodiversity Gain Plan has been submitted to the planning authority, and
 - b) the planning authority has approved the plan.

Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

Irreplaceable habitat - If the onsite habitat includes irreplaceable habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans.

The Biodiversity Gain Plan must include, in addition to information about steps taken or to be taken to minimise any adverse effect of the development on the habitat, information on arrangements for compensation for any impact the development has on the biodiversity of the irreplaceable habitat. The planning authority can only approve a Biodiversity Gain Plan if satisfied that the adverse effect of the development on the biodiversity of the irreplaceable habitat is minimised and appropriate arrangements have been made for the purpose of compensating for any impact which do not include the use of biodiversity credits.