

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	30/07/2026
Application Number:	PL/2026/03494
Proposal:	Timber framed Sheep Shelter on concrete base to be added to existing field.
Site Address:	Sands Farm, Easterton Sands, Easterton, Devizes, SN10 4PY
Case Officer:	Jane Sanger

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☐	Condition (no objection subject to conditions)
☒	Objection - further information required
☐	Objection in principle
☒	HRA.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	30/07/2026 Clarification of BNG Exemption: must be demonstrated that proposals impacts less than 25 square metres of onsite habitat; or, submit the statutory metric calculation with the correct baseline habitats, condition assessments and associated baseline habitat plans. (see comments in main text)	NO

The outstanding document(s) listed above are needed to enable the council's ecology team to consider all the relevant impacts and benefits of the proposed scheme. The council's ecologists will provide a further response once all the above information has been submitted via the case officer.

Please Note: When resubmitting a revised document, **ALL** changes must be highlighted to enable review.

Thank you for your consultation on the above application. I have reviewed the submitted documents against OS maps, aerial photographs of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Proposed Site & Block Plan. April 2026. MH Property Consultants Ltd. Drawing No. 03;
- Existing Site & Block Plan. April 2026. MH Property Consultants Ltd. Drawing No. 02.

Salisbury Plain Special Protection Area (SPA)

This application lies within the 6.4km zone of influence of the Salisbury Plain SPA and in light of the HRA for the Wiltshire Core Strategy and the HRA for the Wiltshire Housing Site Allocations Plan it is screened into Appropriate Assessment due to the potential impact of recreational pressure on stone curlew in combination with other plans and projects.

However, since this is an application for non-residential works, the above strategy does not apply.

Ancient Woodland and Priority Habitat Deciduous Woodland

The application lies south of Heath Ground County Wildlife Site (CWS), which is classified as a lowland beech and yew woodland and lowland mixed deciduous woodland on an ancient woodland site. Ancient woodland is an irreplaceable and protected habitat under NPPF paragraph 193(c). Paragraph 193.c of the NPPF which states that *'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists'*. Woodland of this type is also important to protected and notable species including bats and dormice. It is anticipated that bats use the area for foraging and commuting and therefore the woodland edge must be protected from damage during construction.

Ancient woodland must be adequately buffered in accordance with Government guidance, which states that *"proposals should have a buffer zone of at least 15 metres from the boundary of the woodland."* The development is positioned away from the woodland edge, thereby avoiding any encroachment into the buffer or loss of sensitive habitat. Should proposals change such that tree or scrub removal within or adjacent to the woodland is required, further surveys would be necessary and mitigation measures would need to be reviewed and revised accordingly.

Priority habitats are considered to be features of nature conservation value by Core Policy 50 of the Wiltshire Core Strategy which states *"development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term"*. There is also an expectation that *"All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development"*. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource.

Biodiversity Net Gain

From 12 February 2024 Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). This application was submitted after Biodiversity Net Gain (BNG) became mandatory however information required for applications subject to the biodiversity gain condition has not been submitted.

The development must meet the following criteria to qualify for the de minimis exemption:

- does not impact an onsite priority habitat (a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006); and
- impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat (as defined in the statutory metric).

It is noted that the application form states that the proposal includes a "concrete base to be added to existing field". In the Biodiversity Net Gain section of the application form, it is indicated that the development would affect more than 25 square metres of on-site habitat, with the area affected stated as 34m². As such, the development does not qualify for exemption under the de-minimis threshold and is therefore subject to the requirements of mandatory Biodiversity Net Gain (BNG).

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

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

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

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

Insufficient information has been submitted. In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected habitats or species. The information outlined above must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.

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

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

Ecologist	Date