

## Council Planning Consultation Response

### ECOLOGY

|                        |                                                                                                                      |
|------------------------|----------------------------------------------------------------------------------------------------------------------|
| <b>Officer name:</b>   | Elizabeth Burrows, Senior Ecologist                                                                                  |
| <b>Date:</b>           | 01/10/2026                                                                                                           |
| <b>Application No:</b> | PL/2026/02714                                                                                                        |
| <b>Proposal:</b>       | The siting of an additional four pheasant rearing sheds within the previously approved rearing pen at Woodcombe Farm |
| <b>Site Address:</b>   | Woodcombe Farm, Brixton Deverill, Warminster, BA12 7EJ                                                               |
| <b>Case Officer:</b>   | David Cox                                                                                                            |

### Recommendations:

|                                     |                                                |
|-------------------------------------|------------------------------------------------|
| <input type="checkbox"/>            | No Comment                                     |
| <input type="checkbox"/>            | Support                                        |
| <input type="checkbox"/>            | No objection                                   |
| <input type="checkbox"/>            | Condition (no objection subject to conditions) |
| <input checked="" type="checkbox"/> | Objection - further information required       |
| <input type="checkbox"/>            | Objection in principle                         |
| <input checked="" type="checkbox"/> | HRA. River Avon SAC: Hampshire Catchment       |

Appropriate Assessment with a positive conclusion must be sent to Natural England, who must agree the conclusion (within 21 days) prior to this application being permitted.

### Further Information Required:

|   | Issue                               | Policy/Legislative Compliance      | Date information requested & Further information required                                                                                                            | Satisfactorily addressed (Document & Date submitted) |
|---|-------------------------------------|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 1 | River Avon SAC: Hampshire catchment | CP50, Habitats Regulations 2010.   | Evidence to demonstrate nutrient neutrality as requested by Natural England.                                                                                         |                                                      |
| 2 | Biodiversity Net Gain (BNG)         | Town and Country Planning Act 1990 | Statement setting out the reasons why they believe the application meets the criteria of this or any other exemption.<br>Or<br>Minimum BNG information as requested. |                                                      |

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.

### Information considered:

- Combined Proposed Pheasant Shed Drawings. (David James, No Date).
- Location Plan. (David James, No Date).

- Proposed variation of Condition 2 of Planning Permission No. 2022/01635/FUL. Drawing Number: 40698-02-001revB. (David James, April 2026).
- Supporting Statement to be submitted in conjunction with an Full Planning Application Woodcombe Farm, Brixton Deverill, Warminster, BA12 7EJ. (David James, submitted 27 April 2026)

## COMMENTS:

An Ecological Assessment has not been submitted in support of this application. Historical aerial photography indicates that most of the site was under arable cultivation prior to its use for bird rearing. More recent aerial photography shows hedgerows along the eastern and southern boundaries of the site; however, the submitted plans indicate that these features will be retained and will not be affected by the proposed development.

Given the scale and nature of the proposal, and apart from potential effects on the River Avon SAC: Hampshire catchment as discussed below, significant impacts on biodiversity are considered unlikely.

## Habitats Regulation Assessment (HRA) – River Avon Special Area of Conservation: Hampshire catchment

The development lies approximately 2300m from the closest designated section of the River Avon SAC: Hampshire catchment and approximately 200m from the River Wyle County Wildlife Site (CWS) which represents the headwaters of the River Avon SAC. Given the separation of the development from the River Wyle and SAC direct impacts from land loss or construction impacts on the River Wyle CWS or River Avon SAC are not anticipated.

The Supporting Statement states that the additional four sheds would allow the applicant to rear an additional 8,000 birds within a rearing season and that the pheasant birds are reared on site for no longer than 7 weeks and the partridge remain on site for no longer than 14 weeks in any year.

However, as this development is for agricultural intensification within the catchment of the River Avon SAC it has potential to cause adverse effects alone or in combination with other developments through discharge of phosphorus into the catchment. Habitat Regulations Assessment must be carried out by the relevant Competent Authority (the LPA) to determine the potential significant effects, and the suitability of any measures proposed to avoid or mitigate those effects. To be considered acceptable, the proposed development must achieve nutrient neutrality and therefore must not result in any net increase in phosphorus loading within the catchment.

In order for the council to undertake the HRA the information requested by Natural England in consultation response C-1592249 dated 21/08/2026 must be submitted.

## Biodiversity Net Gain (BNG)

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

The application form claims the development meets the de minimis exemption from BNG because the '*development to be located within the existing rearing boundary and sheds are rotated and removed from site when not in rearing season*'.

In order to claim the de minimis exemption the development must meet the following criteria:

- The development 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).

For the following reasons the development does not appear to meet this exemption:

- The application form states that the Site Area is 1.21 hectares. Council mapping indicates the Site Area measures 1.36 hectares.
- The exact footprint (m<sup>2</sup>) of the sheds has not been specified however the Combined Proposed Pheasant Shed Drawings indicates that the footprint of each shed exceeds 25m<sup>2</sup>.
- Latest Aerial Photography shows large areas of bare ground strongly indicating that even with sheds being rotated as permitted with application PL/2026/02714 the existing rearing activities are resulting in impacts on grassland/ on-site habitat. It is also noted that the photography only shows 10 shed and the permitted 14 and proposed 16 are likely to have a greater impact.



Aerial photography showing impact of the existing activities.

The sheds exceed 25 m2 and the rotation of sheds does not appear to be prevent impacts on habitat therefore the application does not appear to meet the de minimis exemption. 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 further information setting out the reasons why they believe the application meets the criteria of this or any other exemption.

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

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

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

## CONDITIONS:

Conditions will be recommended once the issues raised in this response have been addressed.

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

|           |      |
|-----------|------|
| Ecologist | Date |
|           |      |

