

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	04/06/2026
Application number:	PL/2026/01809
Proposal:	To enable the area of land known as Melksham Rugby and Football clubs, to hold a Music Event and festival
Site address:	Melksham Football and Rugby Club, Eastern Way, Melksham, SN12 7GU
Case officer:	Jonathan James

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
a)	Adverse impacts on protected and notable species. Loss and degradation of mitigation required for 13/06739/FUL	Habitat Regulations, NPPF, Wiltshire CP50	04/06/2026 -Demonstration that mitigation agreed for 13/06739/FUL is unaffected -Wildlife-sensitive lighting scheme -Plan showing fencing types, specifications and locations	

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 consulting Ecology. I have reviewed the application and supporting documents against OS Maps, aerial photography 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:

- Ecological Impact Assessment, Herdwick Ecology, May 2025
- Lighting assessment, unauthored, undated
- Ecological Addendum Note – WTF26, unauthored, April 2026
- Ecological Clarification Note, unauthored, undated

- Event Management Plan, Wiltshire Throwback Festival, April 2026

The site comprises Melksham Football & Rugby Club where it is proposed to install an arena, parking and associated facilities to enable a music event/festival.

COMMENTS:

General

A previous ecological impact assessment has been provided, which appears to refer to a 2025 event, stating “a maximum of 3000 tickets per day” will be available. This is contrary to information included in the event management plan, which states a license for up to 4,999 attendees will be sought. This large-scale two-day event has the potential to adversely affect nesting birds, reptiles, great crested newts, foraging and commuting bats and other wildlife. Previously, an application for the 2025 event was refused on ecology-related grounds, though it appears that the event proceeded. Whilst it is appreciated that this proposal concerns a temporary disturbance to the area, the potential impacts of high-intensity disturbances (i.e., noise and lighting) and the necessary mitigation must be considered.

The amenity grassland across the majority of the site is of limited or negligible ecological value. However, the boundary habitats (hedgerow, trees, scrub and grassland) represent enriched ecological habitat required for mitigation for an approved application (13/06739/FUL). This was highlighted in a previous consultation response for the 2025 event (PL/2025/04158). Whilst the ecology report recommends full fencing (heras fencing) of these sensitive areas, the ‘ecological addendum note’ amends this to rope fencing supported by stewarding operations. No enforceable plan detailing the fencing locations or specifications has been provided, and it is unclear what buffers will be implemented. **This information is required prior to the determination of the application and must demonstrate suitable buffers and measures to restrict all access to ecologically sensitive areas.**

Dark corridors – where lighting does not exceed 1 lux – were secured as part of 13/06739/FUL within and at the borders of the current application site. A document noting general lighting proposals has been submitted, but there are no details of the specifications or locations of each light source, nor lux plots and mapping showing the retention of the approved dark corridors. The lighting document does not refer to additional floodlighting, whereas the ecology report states that floodlighting will be added “as needed”. An increase in artificial lux levels can affect wildlife such as bats, potentially resulting in roost abandonment and/or the severance of key foraging areas. **A full lighting scheme – including any necessary mitigation (e.g., the use of screening, sensitive site configuration, appropriate luminaire specifications) – must be submitted prior to the determination of the application.** The scheme must not be in conflict with the dark corridors approved under 13/06739/FUL.

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). The biodiversity metric allows for temporary impacts that can be restored within 2 years to be excluded from calculations (see Section 3 of [Government response and summary of responses - GOV.UK](#)). Given the management and type of habitat to be directly impacted (species-poor grassland maintained as a short sward), I agree with the ecology report’s suggestion that it can be reinstated following its temporary use and therefore, BNG *per se* is not obligatory.

However, Core Policy 50 of the Wiltshire Core Strategy requires all development to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 193d). **Therefore, considering the potential for repeated and intensive (though temporary) use of the grounds for events, enhancements for biodiversity would be appropriate (to be installed in areas of low disturbance) and should be secured via a condition.**

IN SUMMARY: 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.

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

Ecologist	Date
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