

Council Planning Consultation Response

ECOLOGY

Officer name:	Elizabeth Burrows
Date:	17/08/2026
Application No:	PL/2026/02966
Proposal:	Outline planning application for the erection of up to 275 dwellings (including affordable housing), associated infrastructure, landscape and biodiversity enhancements, with all matters reserved except for the main access from Sandridge Common
Site Address:	Blackmore Farm, Sandridge Common, Melksham, SN12 7QS
Case Officer:	Isobel Nowosielski

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	Baseline	CP50	Location of neutral grassland indicator species to evidence grassland communities.	
2	Mitigation (bats and dormice)	CP50, NPPF 187. d	Amendment of EPP to specify all required ecological parameters (refer to points 1-6).	
3	BNG Baseline	Town and Countryside Act	Confirmation of grassland baseline.	

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:

- Environmental Statement. Chapter 7. Biodiversity.
- Environmental Statement: Chapter 7. Technical Appendix 7.5: Botanical Species List. (ead Ecology, March 2026).
- Environmental Statement: Chapter 7. Technical Appendix 7.6: Hedgerow Survey. (ead Ecology, March 2026).
- Environmental Statement: Chapter 7. Technical Appendix 7.7: Great Crested Newt Survey. (ead Ecology, March 2026).

- Environmental Statement: Chapter 7. Technical Appendix 7.8: Reptile Survey. (ead Ecology, March 2026).
- Environmental Statement: Chapter 7. Technical Appendix 7.9: Breeding Bird Survey. (ead Ecology, March 2026).
- Environmental Statement: Chapter 7. Technical Appendix 7.10: Barn Owl Survey. (ead Ecology, March 2026).
- Environmental Statement: Chapter 7. Technical Appendix 7.4: Phase I Habitat Survey. (ead Ecology, March 2026).
- Environmental Statement: Chapter 7. Technical Appendix 7.16: Biodiversity Net Gain Assessment. (ead Ecology, April 2026).
- Environmental Statement: Chapter 7. Technical Appendix 7.13: Bat Roost Survey. (ead Ecology, March 2026).
- Environmental Statement: Chapter 7. Technical Appendix 7.14: Bat Activity Survey. (ead Ecology, March 2026).
- Environmental Statement: Chapter 7. Technical Appendix 7.15: Otter and Water Vole Survey. (ead Ecology, March 2026).
- Figure 7.1: Ecological Parameters Plan. (ead Ecology, 16/04/2026).
- The Statutory Metric. Calculation Iteration 2. (14th April 2026, ead Ecology).

COMMENTS:

Natural England has raised a holding objection to the application pending receipt of additional information. Reference should be made to Natural England's consultation response dated 16 July 2026 for further details of the information requested

The site is situated within a predominantly agricultural landscape. However, as indicated on the Illustrative Masterplan land immediately to the west benefits from outline planning permission for the development of up to 650 dwellings (ref. PL/2023/01949). However, it must be noted that the layout of the adjacent consented site has not yet been confirmed, in particular the green corridor that separates the two site does not reflect the submitted detailed layout.

The site is reported to comprise predominantly poor semi-improved grassland, bounded by an established network of species-rich hedgerows (Priority Habitat and Important under the Hedgerow Regulations), ditches, scattered mature trees and a tributary of Clackers Brook (Priority Habitat). Three veteran oak trees are present on site. Hedgerows within the site represent corridors connecting blocks of broadleaved woodland and rivers both of intrinsic biodiversity value in the wider landscape.

Two parcels of semi-natural broadleaved woodland occur immediately adjacent to the site, to the west and south-east. The habitats represent Lowland Mixed Deciduous Woodland, a UK Priority Habitat are considered of Parish to District ecological importance and of importance to protected and notable species confirmed as present (dormice and bats).

The grassland descriptions in paragraphs 7.47 and 7.48 are consistent with improved and semi-improved grassland. However, the botanical species list in Appendix 7.5 includes four species associated with species-rich neutral grassland (common spotted-orchid, corky-fruited water-dropwort, meadow vetchling and glaucous sedge), and their locations are not specified. **Confirmation of the locations of these species, together with justification for the grassland habitat classifications in those locations, is therefore required to verify the status of the grassland**

The following protected species have been confirmed as present and represent a constraint to the development:

- Hazel dormouse - considered present throughout the site's hedgerow network.
- Common pipistrelle roost confirmed in a bat box on Tree 21.
- Natterer's bat roosts confirmed in cavities within Trees 24 and 39.
- At least ten bat species were recorded commuting and foraging across the site including rare and declining lesser horseshoe bat, greater horseshoe bat and barbastelle (Priority Species).
- Badger - three outlier setts recorded within the site, with active signs including paths and latrines.
- Grass snake - one individual recorded during reptile surveys, confirming presence.

- Breeding birds – including red list and ground nesting species.
- Barn owl - pellets found beneath a suitable cavity tree and a roost is assumed to be present within a mature oak on site.

A European Protected Species (EPS) bat and dormice Mitigation Licence may or will (respectively) need to be obtained for the lawful construction of this development. In addition a licence will need to be obtained to carry out works impacting nesting barn owl and badger setts.

Ecological Parameters Plan (EPP)

The EMMP is welcomed and once agreed will provide an appropriate mechanism for securing the established ecological parameters within which the final site layout should be developed to ensure that ecological constraints, mitigation measures and biodiversity enhancement objectives are effectively incorporated into the design and delivery of the scheme. To fulfil this purpose, the document must clearly define all constraints and specified mitigation parameters. Notwithstanding the issues raised in this response the EPP indicates that the site has sufficient space to deliver required mitigation within substantial areas of undeveloped green space. Once the following issues have been addressed agreed the EPP should be used to secured ecological mitigation and provide a framework for subsequent detailed applications.

1. The specified buffer widths around retained woodland, veteran trees and badger setts provide clear specifications and are welcomed. However, although the EPP indicates that retained hedgerows, woodland and Clackers Brook will be located outside the development footprint, the minimum buffer widths required to protect these features and support associated protected species, including dormice and bats, have not been specified. The EPP should therefore be amended to clearly secure all minimum buffer widths.
2. Woodland planting along the eastern and western boundaries is welcomed, but the minimum width of these woodland belts has not been specified. This should be defined and secured through the EPP and landscape strategy to demonstrate that the planting will be substantial enough function as woodland habitat, provide connectivity and deliver the anticipated biodiversity benefits.
3. The proposed 5 m dark corridor is not considered sufficient on its own to maintain a functional bat corridor for the rare and light averse species recorded on site. A wider landscape buffer should be provided in addition to the dark corridor, with its width clearly specified in the EPP.
4. Given the anthropogenic impacts associated with the development, it is agreed that retained hedgerows are likely to be subject to increased pressures on dormouse populations, particularly through elevated risks of cat predation. Retained hedgerows intended to support bats, dormice and birds should be protected by specified landscape buffers. Several east-west hedgerows will become constrained or fragmented by development and should either be buffered appropriately or compensated for through additional mitigation. The location of this mitigation must specified.
5. The proposed woodland and grassland enhancements, including Clackers Valley Park, are welcomed and have the potential to benefit dormice, bats, otter, water vole and other notable species. However, it is unclear whether habitat creation and enhancement for these species forms a primary objective of the proposals. The EPP should clearly set out habitat creation and management objectives for retained, enhanced and newly created habitats, particularly for bats, dormice, water vole, otter, barn owl, birds and reptiles.
6. Delivery of the anticipated biodiversity benefits will require the southern open space to function as high-quality semi-natural habitat. While this may be compatible with managed public access, roads and artificial surfacing are unlikely to be, and references to roads within this area should therefore be removed from the EPP.

The EPP must be amended to address the issues raised above and resubmitted to the LPA.

Biodiversity Features

To increase opportunities for biodiversity, new developments will be expected to provide at least one integrated biodiversity feature per dwelling/building. Features should be designed for specific species or groups of species and their location and details must be shown on site plans and supporting drawings. It is anticipated this provided in the EMP or Landscape and Ecological Management Plan.

Biodiversity Net Gain (BNG)

Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) this application is required to deliver 10% Biodiversity Net Gain (BNG). The Biodiversity Gain Plan condition will automatically apply if approval is forthcoming.

A completed statutory metric calculation (The Statutory Metric. Calculation Iteration 2. 14th April 2026, ead Ecology) calculating the baseline and predicted post- development biodiversity units of the site has been submitted (including the condition assessment sheets (where applicable) and maps).

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

On-site pre-development (baseline) biodiversity value	TBC Habitat units
	45.10 Hedgerow units
	3,82 Watercourse units
Are there any <u>irreplaceable</u> habitats on-site?	Yes (veteran trees)
Has any habitat <u>degradation</u> of occurred?	No

The following issues must be addressed in the baseline prior to determination:

- Confirmation of grassland habitat types (refer to request for further information).

The proposed BNG is considered ‘significant’ due to:

- (i) the scale and nature of the application (major);
- (ii) units required (53.71 units), and
- (iii) the BNG proposed (including medium and high distinctiveness habitats of rivers and streams, species-rich native hedgerow and trees and irreplaceable habitat).

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

In order for the council to fulfil its BNG monitoring responsibilities, a Biodiversity Net Gain On-site 30 year Monitoring Fee must be secured through a Section 111, Section 106 or Unilateral Undertaking at the time of permission with contributions secured prior to commencement. The applicant should be directed to the Guidance Note for Completing Agreements Under S.111 of the Local Government Act 1972. Where the applicant elects to use the S111 process the fee must be paid and S111 signed by both the applicant and the council on the granting of planning permission.

In order for the council to fulfil is monitoring obligations, the BNG monitoring fee would be £12,000 lus legal fees payable on commencement of development.

DRAFT CONDITIONS:
The following, or similarly worded, conditions are recommend:

COMPLIANCE WITH SUBMITTED DOCUMENTS
The development will be carried out in strict accordance with the following documents:

- Figure 7.1: Ecological Parameters Plan. (ead Ecology, 16/04/2026). **[VERSION TO BE CONFIRMED]**

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

Habitat Management and Monitoring Plan (HMMP)
No development shall commence on site until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the statutory Biodiversity Gain Plan and including:

- a non-technical summary;
- the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the statutory Biodiversity Gain Plan and schedule for implementation;
- the management measures to maintain habitat in accordance with the statutory Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- the monitoring methodology and specification of a Monitoring Pack (to include but not exclusively up to date Management Actions Logs, Habitat Condition Assessment Reports, metric calculation; and corresponding post intervention Habitat Map) which shall be submitted to the Local Planning Authority in years 2 (two) 5 (five) 10 (ten) 15 (fifteen) 20 (twenty) and 30 (thirty) of the Maintenance Period,

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

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

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

CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN (CEMP)

Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

- a) Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
- b) Working method statements for protected/priority species, such as roosting bats, barn owl, dormice, nesting birds and reptiles.
- c) Mitigation strategies already agreed with the local planning authority prior to determination, such as for great crested newts, dormice or bats; this should comprise the pre-construction/construction related elements of strategies only.
- d) Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
- e) Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

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

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

LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN (LEMP)

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

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

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

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LIGHTING
No external light fixture or fitting will be installed within the application site unless details of existing and proposed new lighting have been submitted to and approved by the Local Planning Authority in writing. The submitted details will demonstrate how the proposed lighting will impact on bat habitat compared to the existing situation.
The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 “Bats and artificial lighting at night”, issued by the Bat Conservation Trust and Institution of Lighting Professionals.

REASON: To avoid illumination of habitat used by bats.

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

Ecologist	Date