



Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Attention of Isobella Wise

Our ref: P907/C20/JC/1

31 July 2026

Dear Ms Wise

**PL/2026/02966 – Land at Blackmore Farm, Sandridge Common, Melksham
Response to Natural England consultation response dated 16 July 2026**

We write on behalf of the applicant in response to Natural England's consultation letter dated 16 July 2026. Natural England has objected pending further information relating to the baseline grassland habitats, presentation of bat activity data and clarification of ecological buffer widths.

The matters raised are addressed below. In our professional opinion, the information already submitted is sufficient to enable the ecological effects of the proposed development to be understood and appropriately controlled at this outline stage.

Baseline grassland habitats

Natural England has requested a separate botanical species list for each field, including an indication of relative abundance within the sward using a method such as DAFOR. This request appears to arise from the presence of some grassland indicator species within the botanical information already submitted.

The habitat survey was undertaken at an appropriate time of year by an experienced botanist holding FISC Level 4 accreditation. It followed the UK Habitat Classification methodology and the relevant statutory biodiversity metric habitat-condition assessment methodology. These are the established standard methods for identifying and evaluating habitats in the context of development and biodiversity net gain.

The survey identified the grassland fields as modified grassland, in either poor or moderate condition. The classification was based on the overall composition, structure, management and ecological characteristics of the swards, rather than simply the presence or absence of individual species. The occurrence of occasional species that may also be associated with more diverse grasslands does not, in isolation, demonstrate that a sward meets the definition of species-rich or priority grassland.

The recording of comprehensive field-by-field species lists and DAFOR abundance scores is not a requirement of either the UKHab methodology or the applicable habitat-condition assessment for modified grassland. Such information may be appropriate where there is reasonable evidence that a grassland could qualify as a more valuable habitat type and further botanical assessment is needed to resolve its classification. In this case, however, the surveys did not identify characteristics indicative of species-rich neutral grassland or another higher-distinctiveness grassland habitat.

The requested additional information would therefore go beyond the standard good-practice methodologies applied to the site and would not be proportionate to the nature and condition of the habitats recorded. The submitted survey information is sufficient to establish the baseline habitat types, evaluate their importance and inform the impact assessment and biodiversity metric.

Presentation of bat activity data

Natural England has requested heat maps to provide a better understanding of the spatial distribution of bat activity in relation to the proposed layout.

The relevant surveys were undertaken as Night-time Bat Walkover surveys in accordance with Bat Conservation Trust guidance. This survey method is deliberately responsive: surveyors alter their movements and observation effort in response to bat activity, habitat features and emerging observations during the survey. Consequently, survey effort is not evenly distributed across the site.

Heat maps would imply a consistent and spatially comparable level of sampling effort across the survey area. Applying them to responsive walkover data could therefore give a misleading impression of relative activity levels, with areas receiving greater surveyor attention appearing artificially more important than areas subject to less observation effort.

Heat maps are more suited to data collected through standardised or spatially fixed sampling methods. They are not considered an appropriate representation of Night-time Bat Walkover results unless the underlying sampling effort has been designed specifically to support that form of analysis.

The bat activity results are presented spatially in Figure A7.14.1 of the Environmental Statement, which shows the locations and nature of the bat observations recorded. This approach is aligned with the relevant survey guidance and allows the results to be interpreted alongside the habitats, proposed development and retained ecological corridors without implying a degree of quantitative spatial precision that the survey methodology cannot support.

The submitted assessment has already recognised the importance of retained boundary habitats and the woodland edge for bat foraging and commuting. The scheme has consequently been designed to retain and reinforce these features through the proposed valley park, habitat enhancements, ecological corridors and lighting controls.

Trowbridge and Westbury Bat Mitigation Strategy

Natural England recommends that the guidance contained in the Trowbridge and Westbury Bat Mitigation Strategy be applied because Annex II bat species were recorded during the surveys. It also suggests that buffer widths should accord with that strategy.

The application site is located outside the Bat Sensitivity Zones identified by the Trowbridge and Westbury Bat Mitigation Strategy. The strategy does not therefore apply directly to the proposed development.

The presence of Annex II bat species does not, by itself, extend the geographical application of the strategy beyond its defined sensitivity zones. The ecological requirements of the bats recorded have instead been considered through a site-specific assessment based on the habitats present, the observed patterns of activity and the nature and scale of the proposed development.

Nevertheless, the scheme incorporates the substantive ecological principles relevant to bat conservation, including:

- retention of important boundary vegetation and the woodland edge;
- provision of a north–south dark bat corridor along the eastern side of the development, plus east–west dark bat corridors across the site;
- substantial habitat retention and enhancement within the southern valley park; and
- restrictions on lighting within and adjacent to sensitive habitats.

Accordingly, although the Trowbridge and Westbury Bat Mitigation Strategy is not directly applicable, the proposals provide site-specific mitigation that addresses the ecological functions identified by the bat surveys.

Ecological buffer widths

Natural England has requested clarification of the proposed buffer widths along the eastern ecological corridor and adjacent to the existing woodland.

The relevant buffer requirements are already set out in the submitted Ecological Parameters Plan and paragraph 7.215 of the Environmental Statement (minimum 5m, <0.5lux). These documents establish the ecological parameters within which the detailed layout at reserved matters stage must be developed.

The eastern boundary corridor will maintain a continuous north–south habitat connection and will be protected from inappropriate development and lighting. The woodland edges and associated areas of elevated bat activity will similarly be retained and buffered through the southern green infrastructure and valley park proposals, which include an east-west dark bat corridor along the woodland edge and Clackers Brook tributary.

As this is an outline application with all matters reserved other than the principal access, it is appropriate for the ecological buffer parameters and lighting performance requirements to be secured at this stage, with their detailed design and implementation demonstrated through subsequent reserved matters submissions. The Ecological Parameters Plan provides the necessary framework to ensure that future layouts retain functional habitat corridors and protect the woodland edge.

Detailed planting, habitat composition, boundary treatments and lighting specifications can then be agreed through the reserved matters process and secured through the Landscape and Ecological Management Plan (LEMP) and detailed lighting strategy.

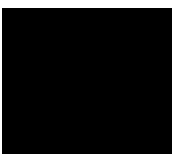
Lighting Strategy, LEMP and CEMP

Natural England's recommendations regarding lighting, habitat management and construction-phase ecological protection are consistent with the measures proposed as part of the application. The submitted ecological strategy requires sensitive lighting design to maintain dark conditions along core bat foraging and commuting habitats during both the construction and operational phases. It also provides for the preparation and agreement of a Landscape and Ecological Management Plan, setting out the detailed establishment, enhancement, long-term management and monitoring of retained and newly created habitats, together with a Construction Environmental Management Plan specifying the measures required to avoid and minimise effects on ecological features during construction. These documents can be secured by appropriately worded planning conditions and agreed with the Council's ecology team before the relevant phase of development commences.

Conclusion

On this basis, we respectfully consider that Natural England's request for further information has been adequately addressed and that its objection can be withdrawn. The remaining matters of detailed design, implementation and long-term management can be appropriately secured through reserved matters submissions and planning conditions.

Yours sincerely



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Director
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