

Technical Note

Project:	Land East of Blackmore Farm, Melksham
Title:	Response to Council Ecologist Consultation Response
Planning reference:	PL/2026/02966
Date:	25 August 2026
Client:	Gleeson Land
Reference:	260825/P907/TN1
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1 Introduction and background

1.1.1 This Technical Note has been prepared by EAD Ecology on behalf of Gleeson Land in relation to their Outline Planning Application for development at 'Land East of Blackmore Farm, Melksham' (Wiltshire Council Planning reference: PL/2026/02966).

1.1.2 An Environmental Statement (ES) was submitted with the Application by the planning consultants, Turley. Chapter 7 of the ES addressed 'Biodiversity' and was produced by EAD Ecology. The Application is also supported by a suite of ecological technical appendices, a statutory Biodiversity Metric and an Ecological Parameters Plan (EPP; Figure 7.1).

1.1.3 This Technical Note responds to the consultation response issued by the Wiltshire Council Ecologist dated 17 August 2026. The Council Ecologist raises a holding objection on the basis that further information is required in relation to:

1. the baseline grassland classification;
2. amendments to the EPP in relation to bats, dormice and other ecological features; and
3. confirmation of the Biodiversity Net Gain baseline.

The response also provides comments on the draft planning conditions proposed by the Council Ecologist.

1.1.4 Natural England raised similar matters in its consultation response dated 16 July 2026, principally in relation to baseline grassland, bat activity and ecological buffer widths. These matters were addressed separately by EAD Ecology in its response dated 31 July 2026 (reference P907/C20/JC/1). The relevant conclusions of that response are reiterated below where applicable.

1.1.5 In EAD Ecology's professional opinion, sufficient ecological information has already been submitted to enable the effects of the proposed development to be understood and appropriately controlled at this outline stage. The EPP in particular provides a high level of ecological design detail for an outline planning application, while appropriately leaving matters of detailed layout, landscape design, habitat management and species-specific mitigation to the Reserved Matters and condition-discharge stages.

2 Response to matters raised by the Council Ecologist

General

- 2.1.1 The Council Ecologist acknowledges that the EPP demonstrates that the site has sufficient space to deliver the required ecological mitigation within substantial areas of undeveloped green space. The EPP is also recognised as an appropriate mechanism for establishing the ecological parameters within which the final site layout should be developed.
- 2.1.2 EAD Ecology agrees with this purpose. However, it is important to distinguish between the role of an ecological parameters plan accompanying an outline application and the subsequent detailed ecological, landscape and management documents that will be prepared once the Reserved Matters layout has been agreed.
- 2.1.3 The EPP already fixes the principal ecological constraints and design requirements, including:
- retention of approximately 3.0 km of hedgerow and associated ditches;
 - retention of established trees, including veteran specimens;
 - retention of the Clackers Brook tributary;
 - 15 m buffers around veteran trees;
 - 15 m buffers around existing woodland;
 - 20 m buffers around retained badger setts;
 - a minimum 5 m-wide network of dark corridors in which lighting will be maintained below 0.5 lux;
 - 5 m construction buffers around retained hedgerows;
 - proposed woodland planting;
 - habitat creation within Clackers Valley Park; and
 - a range of ecological enhancement measures.
- 2.1.4 Requiring the EPP additionally to prescribe detailed landscape widths, the location of individual biodiversity features, species-specific management objectives and the precise relationship between all retained habitats and the future built layout would go beyond the purpose of a parameter plan and would require matters properly reserved for detailed design to be fixed prematurely.

Baseline grassland habitats

- 2.1.5 The Council Ecologist notes that the botanical species list includes common spotted-orchid, corky-fruited water-dropwort, meadow vetchling and glaucous sedge and requests confirmation of the locations of these species, together with justification of the grassland classification at those locations.
- 2.1.6 As set out in EAD Ecology's response to Natural England dated 31 July 2026, 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 established standard methods for identifying, classifying and assessing habitats in the context of development and Biodiversity Net Gain.
- 2.1.7 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 occur within more diverse neutral

grassland communities does not, in isolation, demonstrate that the surrounding sward meets the definition of species-rich neutral grassland or another higher-distinctiveness habitat.

- 2.1.8 The surveys did not identify characteristics indicative of species-rich neutral grassland or another higher-distinctiveness grassland habitat requiring separate classification. The standard survey methodology did not therefore require individual occurrences of these species to be spatially mapped.
- 2.1.9 It would not be appropriate to retrospectively infer a level of spatial botanical precision that was neither required nor collected as part of the survey methodology. Further botanical survey or retrospective mapping of individual indicator species is not considered necessary to resolve the habitat classification.
- 2.1.10 The information submitted is therefore considered sufficient to establish the baseline grassland habitat types and their condition for the purposes of both the Ecological Impact Assessment and statutory Biodiversity Metric.

Biodiversity Net Gain baseline

- 2.1.11 The Council Ecologist confirms that the information contained within the completed on-site baseline habitat tabs of the statutory Biodiversity Metric is accepted as accurate, subject only to confirmation of the grassland habitat types.
- 2.1.12 For the reasons set out above, the modified grassland classifications are considered robust and appropriately evidenced. No amendment to the pre-development habitat baseline is therefore considered necessary.
- 2.1.13 The detailed post-development biodiversity proposals will necessarily evolve alongside the Reserved Matters design and will ultimately be confirmed through the statutory Biodiversity Gain Plan and associated Habitat Management and Monitoring Plan (HMMP). These provide the appropriate statutory mechanism for securing the required biodiversity gain, habitat establishment, management and monitoring.

Ecological Parameters Plan

- 2.1.14 The Council Ecologist identifies six matters which it is requested are incorporated into a revised EPP. These are addressed individually below.

Buffers to retained habitats

- 2.1.15 The Council Ecologist states that minimum buffer widths around retained woodland, hedgerows and Clackers Brook have not been specified.
- 2.1.16 In relation to woodland, this appears to overlook information already presented on the EPP. Figure 7.1 expressly specifies a 15 m buffer around existing woodland, together with 15 m buffers around veteran trees and 20 m buffers around retained badger setts. It also requires all retained hedgerows to have a 5 m protection buffer during construction.
- 2.1.17 The EPP also secures retention of the Clackers Brook tributary and identifies the substantial areas of undeveloped green infrastructure within which the watercourse and associated habitats will be accommodated.
- 2.1.18 The appropriate permanent relationship between individual retained hedgerows or the watercourse and adjoining development will depend upon the nature of the detailed land use,

landscaping, drainage, access arrangements and ecological function of the feature concerned. It is not considered necessary or appropriate at outline stage to impose a single generic permanent buffer width to every retained feature irrespective of context.

- 2.1.19 Detailed offsets, planting, boundary treatments and habitat management can appropriately be determined through the Reserved Matters process and secured through subsequent ecological and landscape submissions.

Woodland planting

- 2.1.20 The Council Ecologist welcomes the proposed woodland planting along the eastern and western boundaries but requests that minimum woodland widths are fixed through the EPP.
- 2.1.21 The EPP already identifies the location and broad extent of approximately 4 ha of proposed woodland planting as part of a wider connected network of retained woodland, hedgerows, grassland, watercourses and southern green infrastructure.
- 2.1.22 The precise width, planting structure, species composition and edge treatment of this woodland will necessarily depend upon the detailed landscape and development layout prepared at Reserved Matters stage. Fixing detailed woodland-belt widths now would introduce a landscape design parameter that is not necessary to establish the acceptability of the outline scheme and could unnecessarily constrain subsequent detailed design.
- 2.1.23 The EPP is considered sufficient to secure the strategic extent and function of woodland creation. Detailed woodland design, establishment and management can appropriately be secured through the Reserved Matters landscape proposals and HMMP.

Dark bat corridors

- 2.1.24 The Council Ecologist considers that the proposed 5m dark corridor is insufficient on its own to maintain a functional bat corridor for the rare and light-averse species recorded and requests that a wider landscape buffer is additionally specified.
- 2.1.25 This appears to conflate the width of the lighting-control zone with the overall width of the ecological and landscape corridor.
- 2.1.26 The EPP specifies a minimum 5m-wide dark corridor, within which lighting levels will be maintained below 0.5 lux. This does not represent the full width of habitat associated with the corridors, which will also include appropriate development offsets to ensure that the <0.5lux lighting levels are realised. The dark-corridor network is embedded within substantially wider areas of retained and proposed habitat, including retained hedgerows, new woodland planting and the southern Clackers Valley Park.
- 2.1.27 The ecological function of these corridors therefore derives from the combination of habitat retention, new habitat creation, wider landscape provision and stringent lighting control, rather than from a standalone 5 m habitat strip.
- 2.1.28 The same 5m minimum dark-corridor parameter has already been accepted in relation to the neighbouring Blackmore Farm development (Wiltshire Council Planning reference: PL/2023/11188). No site-specific evidence has been identified that indicates a wider minimum dark-corridor parameter is necessary for the current application.

2.1.29 As set out in EAD Ecology's response to Natural England, the site also falls outside the Bat Sensitivity Zones identified in the Trowbridge and Westbury Bat Mitigation Strategy. The Strategy does not therefore directly apply to the proposed development. Nevertheless, the development incorporates its relevant ecological principles through the retention and enhancement of habitat connectivity and the provision of dark commuting and foraging routes.

2.1.30 The proposed 5 m minimum dark-corridor parameter is therefore considered appropriate and no amendment is considered necessary.

Retained hedgerows and dormouse mitigation

2.1.31 The Council Ecologist requests additional specified landscape buffers to retained hedgerows used by bats, dormice and birds, together with further mitigation where east-west hedgerows may become constrained or fragmented by development.

2.1.32 The EPP already secures retention of approximately 3.0km of hedgerow and associated ditches, enhancement of retained hedgerows, substantial new woodland planting and habitat creation across the wider green infrastructure network. A 5m construction protection buffer is also required around retained hedgerows.

2.1.33 We recognise that the detailed relationship between retained hedgerows and adjoining development will be important to dormice, bats and other species. However, the appropriate permanent treatment will vary according to the eventual adjacent land use. A hedgerow adjoining public open space or woodland planting, for example, does not require the same detailed treatment as one adjoining a road or residential garden.

2.1.34 These relationships cannot sensibly be prescribed before the Reserved Matters layout has been designed. The appropriate approach at outline stage is to secure the retention and strategic connectivity requirements through the EPP, with detailed setbacks, planting, access controls and boundary treatments subsequently designed in response to the final layout.

2.1.35 Where hedgerow loss is unavoidable, the EPP provides substantial replacement and complementary habitat creation, including new woodland and enhanced hedgerows. Detailed dormouse mitigation will also be subject to the relevant Natural England licensing requirements.

Habitat creation and management objectives

2.1.36 The Council Ecologist welcomes the proposed woodland and grassland enhancements, including Clackers Valley Park, but requests that the EPP identify detailed habitat creation and management objectives for bats, dormice, water vole, otter, barn owl, birds and reptiles.

2.1.37 The EPP already establishes the strategic ecological objectives of the development. It confirms that the proposed habitat creation, including species-rich hedgerows, SuDS basins, wildflower grassland, woodland, orchards and native scrub, will provide suitable habitat and maintain connectivity for a range of fauna. It also identifies specific enhancement measures including integrated bat and bird boxes, tree-mounted bat and bird boxes, reptile hibernacula and hedgehog access measures.

2.1.38 The EPP is not intended to fulfil the function of a detailed habitat management plan or species-specific mitigation strategy. Detailed habitat objectives, establishment specifications, management prescriptions, monitoring criteria and remedial measures will appropriately be set out in the statutory HMMP once the detailed landscape proposals are known.

2.1.39 Construction-phase species protection will similarly be addressed through the CEMP and, where required, protected species licences.

2.1.40 Duplicating this level of detailed management information within the outline-stage EPP is not considered necessary and could create inconsistencies as the Reserved Matters design develops.

Southern open space

2.1.41 The Council Ecologist requests removal of references to roads from the southern open space on the basis that roads and artificial surfacing may be incompatible with delivery of high-quality semi-natural habitat.

2.1.42 The intention of the southern open space, including Clackers Valley Park, is clearly to provide substantial semi-natural habitat creation and enhancement together with compatible public access and green infrastructure functions. No roads are proposed in this area and the only reference to roads within the EPP concerns bat crossing points where dark corridors intersect roads elsewhere within the Site.

2.1.43 The precise alignment, character and surfacing of routes within or adjacent to the southern open space area will be determined through the Reserved Matters process and will need to demonstrate compatibility with the ecological function of the valley park and the habitat creation and Biodiversity Net Gain requirements.

2.1.44 It is therefore not considered necessary to amend the EPP in this respect.

Biodiversity features

2.1.45 The Council Ecologist states that new development should provide at least one integrated biodiversity feature per dwelling/building and that the location and details of such features should be shown on site plans and supporting drawings.

2.1.46 This level of detail is not appropriate or possible at outline stage, when the detailed building layout, house types and elevations have not yet been determined.

2.1.47 The principle of incorporating biodiversity features within the development is accepted and is already expressly established by the EPP, which identifies integrated bat and bird boxes within new buildings together with additional features within retained and proposed habitats.

2.1.48 The number, type and location of individual features should appropriately be determined through Reserved Matters once the building and landscape layouts are known. There is therefore no need for these matters to be prescribed spatially within the current EPP.

Draft planning conditions

Habitat Management and Monitoring Plan

2.1.49 The requirement for an HMMP is accepted in principle. A detailed HMMP will be required in association with the statutory Biodiversity Gain Plan and will provide the mechanism for securing habitat establishment, management, monitoring and remedial measures for the required 30-year period.

2.1.50 Given the scale and phased nature of the development, the timing of the condition should allow the HMMP, or relevant phase-specific elements of it, to be approved prior to commencement of the phase to which those measures relate.

Construction Environmental Management Plan

- 2.1.51 The requirement for a CEMP is accepted in principle. The CEMP provides an appropriate mechanism for securing construction-phase ecological protection, including habitat protection zones, species-specific working methods, timing restrictions and ecological supervision.
- 2.1.52 Again, given the scale and phased nature of the development, the condition should allow relevant phase-specific CEMPs to be submitted and approved before commencement of works within the corresponding phase.

Landscape and Ecological Management Plan

- 2.1.53 The Council Ecologist additionally proposes a separate LEMP condition requiring long-term objectives, management responsibilities, maintenance schedules, monitoring and adaptive management for ecological features within the development.
- 2.1.54 It is not considered necessary to require a separate LEMP in addition to the statutory HMMP. There is substantial overlap between the two documents, particularly in relation to habitat establishment, management objectives, maintenance, monitoring and adaptive management.
- 2.1.55 The HMMP will be required to address habitat creation, enhancement, long-term management and monitoring in accordance with the approved Biodiversity Gain Plan. Requiring a separate LEMP covering materially the same habitats and management functions would result in unnecessary duplication and create a risk of inconsistency between parallel management documents.
- 2.1.56 It is therefore recommended that the proposed LEMP condition is removed and that any necessary ecological management requirements are incorporated into the HMMP. Detailed landscape implementation matters that fall outside the scope of the HMMP can be addressed through the Reserved Matters landscape submissions. This would also simplify future compliance and monitoring by providing a single ecological management framework.

Lighting

- 2.1.57 The principle of controlling external lighting to protect bat habitat is accepted. The EPP already establishes a minimum 5 m-wide network of dark corridors within which lighting levels will be maintained below 0.5 lux.
- 2.1.58 The detailed lighting strategy should therefore demonstrate how the final lighting design complies with these parameters and avoids inappropriate illumination of retained and created habitats.
- 2.1.59 However, clarification is requested as to the intended scope of the proposed condition. As currently drafted, the condition states that "no external light fixture or fitting" may be installed unless details have first been approved by the LPA.
- 2.1.60 It is unclear whether this is intended to apply only to adopted or communal external lighting, including street lighting, or also to individual domestic property-mounted external lights installed by future residents.
- 2.1.61 If the latter is intended, consideration should be given to whether such a restriction can reasonably and practically be controlled through the planning condition. EAD Ecology therefore recommends that the condition is expressly limited to lighting installed as part of the approved development, including street lighting and developer-installed external lighting, with appropriate controls for plots adjoining sensitive ecological corridors.

3 Summary

- 3.1.1 This Technical Note addresses the matters raised by the Council Ecologist in the consultation response dated 17 August 2026.
- 3.1.2 The ecological baseline has been established through surveys undertaken by suitably experienced ecologists using accepted standard methodologies. In particular, the modified grassland classification is considered robust and no further botanical survey or retrospective spatial mapping of individual indicator species is required.
- 3.1.3 The EPP already establishes an unusually detailed suite of ecological parameters for an outline planning application. These include habitat retention, woodland and veteran-tree buffers, badger-sett buffers, hedgerow construction protection, dark-corridor requirements, woodland creation, strategic habitat connectivity and ecological enhancement measures.
- 3.1.4 The additional detail requested by the Council Ecologist in relation to precise woodland widths, permanent hedgerow buffers, detailed species-specific habitat objectives and the location of individual biodiversity features is more appropriately determined through the Reserved Matters and subsequent condition-discharge stages once the detailed development and landscape layouts are known.
- 3.1.5 The proposed 5 m minimum dark corridor relates to the width of the lighting-control zone and should not be interpreted as the full width of the associated ecological corridor. The dark routes operate within substantially wider areas of retained and newly created habitat. The same minimum dark-corridor parameter has previously been accepted for the adjacent development.
- 3.1.6 The HMMP and CEMP conditions are accepted in principle, subject to appropriate phasing. A separate LEMP is not considered necessary because its proposed functions substantially duplicate those of the statutory HMMP. Clarification is also requested regarding the intended scope of the proposed lighting condition.
- 3.1.7 On this basis, EAD Ecology considers that sufficient ecological information has been submitted to enable the Outline Planning Application to be determined and that the Council Ecologist's holding objection can be withdrawn. The remaining matters of detailed ecological design, implementation and long-term management can appropriately be controlled through Reserved Matters submissions, the statutory Biodiversity Gain Plan and HMMP, the CEMP, detailed lighting proposals and protected species licensing where applicable.