

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name: Elizabeth Burrows
Date: 17/07/2026, 03/09/2025 (red text)
Application No.: PL/2026/03321
Proposal: Discharge of Condition 17 (Ecological Mitigation and Management Plan) of PL/2023/11188
Site Address: Land at Blackmore Farm, Sandridge Common, Melksham, SN12 7QS
Case Officer: Alex Jelly

Condition No.	Further information required by condition	Satisfactorily addressed (Document & Date)
17	Prior to commencement of development on site, including site clearance, an Ecological Mitigation and Management Plan (EMMP) shall be submitted to and approved in writing by the Local Planning Authority. The plan which will be prepared in broad accordance with the Ecological Constraints and Opportunities Plan (ES Chapter 10: Biodiversity prepared by ead ecology, 14/12/2023) and Environmental Parameters Plan – Composite (Ref Masterplan 417A Rev. B prepared by Origins, 19/12/2023). The plan will include the following elements: • Evidence of how measures detailed in the Avoidance, Mitigation, Compensation and Enhancement Section (paragraphs 10.134-10.172) and summarised in Table 10.8 of ES Chapter 10: Biodiversity shall be implemented across the Site. • A drawing/s specifying the location of mitigation and enhancement measures required by the Avoidance, Mitigation, Compensation and Enhancement Section (paragraphs 10.134 - 10.172) and summarised in Table 10.8 of ES Chapter 10: Biodiversity. • A drawing/s specifying measured habitat unit areas including condition, hedgerow lengths and measured buffer distances along features of conservation importance. • A drawing/s showing the location, number and specification of new features for nesting birds, roosting bats, reptiles and insects. • Species specific mitigation strategies for reptiles, bats (roosting, foraging and commuting), dormouse, otter and badger.	Yes - Ecological Mitigation and Management Plan (EMMP) (EAD Ecology, August 2026); Report Ref. 260501_P1476_EMMP_Final04

	• A drawing/s specifying the location and extent of habitats and features with species specific management priorities including reptile receptor areas, bat commuting and commuting habitat including dark corridors and cross over points, dormouse habitat, otter mitigation along Clackers Brook and retained at roosts. • Mitigation and enhancement strategy for Clackers Brook tributary and retained broadleaved woodland. • A BNG Calculation for the site, based on Metric 4.0 (as approved). The approved EMMP shall set a framework for all reserved matters applications, which shall only be permitted where in accordance with the approved EMMP and will include timescales for implementing the approved measures. The site shall be managed in accordance with the approved EMMP in perpetuity unless agreed in writing by the Local Planning Authority, and monitoring reports shall be submitted to the Local Planning Authority in accordance with the monitoring programme therein. 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.	
--	--	--

Comments

An updated Ecological Mitigation and Management Plan (EMMP) (EAD Ecology, August 2026; Report Ref. 260501_P1476_EMMP_Final04) has been submitted in response to the previous consultation comments. The revised EMMP continues to provide a reduced level of mitigation, particularly in relation to the bat corridors and associated species-rich and wildflower grassland habitats, when compared with the Ecological Constraints and Opportunities Plan (EAD Ecology, 14 December 2023) and the Environmental Parameters Plan – Composite (Origins, 19 December 2023).

Notwithstanding these amendments, it is accepted that the conclusions of the impact assessment remain robust and can continue to be relied upon. The amended EMMP is therefore considered acceptable. It should be noted, however, that any further reduction in the proposed mitigation measures would not be acceptable unless supported by appropriate ecological justification and up-to-date survey information demonstrating that such changes would not adversely affect the assessment conclusions.

~~For the reasons given below the Ecological Mitigation and Management Plan (EMMP) submitted in pursuant of the discharge of condition 17 is not satisfactory to discharge this condition.~~

The Ecological Mitigation and Management Plan (EMMP) must provide the detailed framework within which all ecological mitigation, compensation and enhancement measures must be delivered. To fulfil this purpose, the document must clearly define the ecological requirements, constraints and parameters within which all future Reserved Matters and discharge of condition applications must be designed and delivered. ~~The submitted EMMP (EAD Ecology, May 2026), provided pursuant to Condition 17, does not achieve this objective for the following overarching reasons:~~

Key Issues

~~The submitted EMMP relates only to Phase 1 of the permitted development. As a principal purpose of the EMMP is to establish the overarching ecological mitigation and management framework for the development as a whole this approach is not acceptable in ecology terms.~~

Notably a fundamental requirement of the strategy is the provision and maintenance of continuous habitat corridors across the site for protected and notable species, including, but not limited to, bats and dormice. These corridors are required to function in both north–south and east–west directions and are integral to maintaining ecological connectivity throughout the development and with the wider landscape. As such these ecological features can only be properly assessed and secured at the whole-site scale. An EMMP limited to Phase 1 cannot demonstrate that these site-wide ecological networks will be retained and function effectively.

Furthermore, significant and essential components of the ecological mitigation and enhancement strategy are anticipated to be delivered outside of Phase 1 including the undeveloped land associated with the tributary of Clackers Brook in the southern part of the site. The delivery of these habitats is fundamental to achieving the ecological objectives of the development. In the absence of a whole-site EMMP, there is insufficient certainty that these measures will be delivered.

~~Accordingly, the EMMP must identify and secure the mitigation and enhancement requirements for the entirety of the development site and cannot be restricted solely to Phase 1.~~

The wording of Condition 17 requires that the EMMP is prepared in broad accordance with the Ecological Constraints and Opportunities Plan (EAD Ecology, 14 December 2023) and the Environmental Parameters Plan – Composite (Origins, 19 December 2023). ~~The submitted EMMP contains several clear departures from these documents, giving rise to significant concerns regarding whether the required mitigation measures will be delivered.~~

In particular, the bat corridors identified within the approved plans, together with associated species-rich and wildflower grassland habitats, appear to have been reduced in extent, fragmented, or removed altogether. ~~As a consequence, habitat connectivity and commuting functionality for bats in both the north–south and east–west directions would be substantially reduced and may be lost entirely in some locations.~~

There also appears to be a general reduction in the extent of hedgerow, wildflower meadow creation and other semi-natural grassland habitats throughout the site, particularly along site boundaries and within linear habitat strips intended to buffer retained hedgerows and contribute to dark corridors for commuting and foraging bats.

~~As the submitted plans do not provide measured areas, lengths or widths for these habitats, it is not possible to quantify the level of reduction or determine whether the ecological functionality envisaged within the approved framework can be achieved. The absence of specified distances also means they can't be appropriately accommodated in the detailed layout.~~

~~In addition, the EMMP does not commit to the delivery of the substantial areas of semi-natural habitat proposed along Clackers Brook, nor does it include the woodland enhancement measures identified for the southern site boundary. These omissions represent significant departures from the approved ecological strategy and further undermine confidence that the development can deliver the intended mitigation and enhancement outcomes.~~

~~More generally, the EMMP lacks the level of detail necessary to ensure that ecological mitigation and enhancement measures will be consistently incorporated within future layouts and reserved matters proposals. The document should specify the minimum habitat areas, corridor widths, buffer widths, habitat lengths and other quantifiable parameters necessary to maintain ecological functionality. Without such requirements, there is insufficient certainty that future design iterations will retain the ecological infrastructure needed to support protected and notable species.~~

~~The EMMP also fails to provide an adequate level of detail regarding the requirements of species-specific mitigation strategies. The absence of clearly defined ecological parameters and mitigation requirements means that it cannot be demonstrated that future phases of development will maintain compliance with the approved ecological strategy or deliver the mitigation necessary to avoid adverse effects on protected and notable species.~~

Report Specific Comments

When compared to Table 10.8 of ES Chapter 10, Ecological Constraints and Opportunities Plan (ES Chapter 10: Biodiversity prepared by ead ecology, 14/12/2023) the following issues have been identified. ~~It should be noted that further issues may arise once the EMMP is updated in response to these comments:~~

- a. An overarching drawing showing the location of all habitats and ecological features that must be retained and protected must be provided.
- b. The Tree Protection Plan referred to within the EMMP has not been submitted. The land to be protected by fencing must encompass and buffers and displayed on a drawing.
- c. The plan should clearly identify the location and extent of all required protective fencing, including protection for:
 - Retained hedgerows;
 - Retained trees;
 - Semi-improved neutral grassland;
 - Grassland supporting corky-fruited water-dropwort;
 - Woodland habitats; and
- a. Other retained ecological features. **Resolved Figure 5.**
- b. Buffer distances associated with protected habitats and features should be clearly specified on plans. **Resolved Figure 5.**
- d. Section 3.1.1 should explicitly require the retention and protection of grassland containing corky-fruited water-dropwort and retained woodland habitats. **Resolved para 2.5.2, 3.1.1 and 3.3.2 and Figure 5.**
- e. The required minimum buffer to the Clackers Brook tributary must be specified, incorporating sufficient land to protect the watercourse, associated habitats and supported protected species. **Resolved para 3.1.1 and Figure 5**
- f. Section 3.1.1 does not adequately reflect the protection and enhancement requirements for bats, reptiles and barn owl and should be revised accordingly. **Resolved para 2.5.2 and 3.1.1 and Figure 5.**
- g. Barn owl should be included within the ecological objectives listed in Section 2.5.5. **Resolved para 2.5.2.**
- h. Suitable locations for barn owl nest boxes should be identified, given the species' sensitivity to disturbance associated with urbanisation. **Resolved Figure 6.**
- i. The anticipated location and extent of habitat required to mitigate impacts on dormouse populations should be specified, recognising the species' sensitivity to urbanisation and reliance on well-connected habitat networks. **Resolved Figure 5.**
- j. The location of receptor sites for species displaced during construction, including dormice and reptiles, must be identified. **Resolved Figure 5.**
- k. Design parameters for culverts should be specified to ensure safe passage for otter and water vole and to ensure these requirements are incorporated into detailed design proposals. **Resolved para 3.4.27.**
- l. The specification and design requirements for bat hop-overs should be provided. **Resolved para 3.4.23.**
- m. The required locations of dropped kerbs, recessed kerbs and gully escape ladders should be shown on a dedicated drawing. **Resolved para 3.4.5.**
- n. The locations of the proposed 80 dormouse boxes should be identified. **Resolved Figure 5.**
- o. The EMMP should specify the minimum corridor width required to maintain bat commuting and foraging functionality and ensure this requirement is secured through future design stages. **Resolved paras 3.4.21, 3.4.22 and 3.4.23.**

~~The EMMP must be amended to address these issues and re-submitted for review. Any deviations from the previously required mitigation measures as stated on the Ecological Constraints and Opportunities Plan and in Table 10.8 of ES Chapter 10, Ecological Constraints must be supported by robust ecological justification.~~

It is also noted that the layout included in the EMMP does not accord with approved plan (condition 5) Parameter Plan – Composite drg no 18045_520 re E. Notably from an ecology perspective the structural landscape buffer at the eastern boundary is largely absent and the green infrastructure appears reduced.

Final sign off – all matters addressed:

Ecologist: Elizabeth Burrows	Date: 03/09/2026
---------------------------------	---------------------