

## Council Planning Consultation Response

### ECOLOGY

|                        |                                                                                                                               |
|------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| <b>Officer name:</b>   | Patrick Olshansky                                                                                                             |
| <b>Date:</b>           | 19/08/2026                                                                                                                    |
| <b>Application No:</b> | PL/2026/04078                                                                                                                 |
| <b>Proposal:</b>       | Approval of reserved matters (scale, layout, appearance and landscaping) pursuant to Outline Planning Permission 21/01004/OUT |
| <b>Site Address:</b>   | Lottage Farm, Lottage Road, Aldbourne, Marlborough, SN8 2ED                                                                   |
| <b>Case Officer:</b>   | <u>Audrey Lo</u>                                                                                                              |

### Recommendations:

|                                     |                                                |
|-------------------------------------|------------------------------------------------|
| <input type="checkbox"/>            | No Comment                                     |
| <input type="checkbox"/>            | Support                                        |
| <input type="checkbox"/>            | No objection                                   |
| <input type="checkbox"/>            | Condition (no objection subject to conditions) |
| <input checked="" type="checkbox"/> | Objection - further information required       |
| <input type="checkbox"/>            | Objection in principle                         |
| <input type="checkbox"/>            | HRA.                                           |

### Further Information Required:

|   | Issue                                                      | Policy/Legislative Compliance | Date information requested & Further information required | Satisfactorily addressed (Document & Date submitted) |
|---|------------------------------------------------------------|-------------------------------|-----------------------------------------------------------|------------------------------------------------------|
| 1 | Kennet and Lambourn Floodplain SAC HRA. SEE COMMENT BELOW. | CHSR                          | Written report or statement.                              | No                                                   |
| 2 | No net biodiversity loss. SEE COMMENT BELOW.               | CP50, NPPF                    | Amended LEMP and landscape plans.                         | No                                                   |
| 3 | Details of construction lighting. SEE COMMENT BELOW.       | CP50, NPPF                    | CEMP                                                      | No                                                   |

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:

- BNG Metric (V2, 01/06/2026)
- Landscape & Ecology Strategy Plan Ref. 20104.101 (mhp, 11/10/21)
- Update Preliminary Ecological Appraisal Report (Stark Ecology, June 2026)
- Landscape & Ecology Management Plan Revision P1 07.05.2026 Greenhalgh Landscape Architecture.
- Lighting Strategy (EDS, April 2026)
- Design and Access Statement (Pegasus Design, January 21)

## COMMENTS:

The following results were provided by the Ecological Impact Assessment (Grassroots Ecology, November 2020) and Letter from Grassroots Ecology (Ref.1303, dated 29/10/2021) submitted in support of 21/01004/OUT:

The site consists of intensively grazed modified grassland, hardstanding, buildings, mixed scrub, ruderal vegetation, three hedgerows and 12 trees. The buildings and trees onsite were assessed to offer negligible potential to support roosting bats and low level of bat activity from common species was observed during surveys. The site appears to have limited potential for other protected species such as dormouse, badger and GCN due to limited availability and connectivity of suitable habitat onsite and beyond. The scrub, ruderal vegetation, hedgerow and trees have potential to support common species of nesting birds, reptiles, amphibians and small mammals and appropriate working methods and landscape management should be implemented to mitigate any impacts to these species. Appropriate lighting should also be secured.

An Update Preliminary Ecological Appraisal Report (Stark Ecology, June 2026) has been submitted in support of this application. The update survey has reclassified the grassland as poor condition other neutral grassland using UK Habs methodology. All other habitats remain the same. Based on the time elapsed since last survey and limited changes in site conditions, the habitat suitability for species has not changed.

## HRA

The previous Ecology consultation comment (24/06/2021) included the following request for further information:

*"It has been brought to my attention that the proposed development has been allocated in the draft Aldbourne Neighbourhood Plan (NP) for only up to 25 houses, with this application proposal being for up to 32 houses. The Habitat Regulations Assessment of the draft Aldbourne NP screens the proposed site into full Appropriate Assessment as there is a mechanism for effect on the Kennet and Lambourn Floodplain SAC on account of an increase in water abstraction. Therefore, the Council requires further information to demonstrate that the proposed development will not have an adverse effect on the integrity of the Kennet and Lambourn Floodplain SAC."*

1. **The above does not seem to be addressed in any of the ecological information submitted in support of this application and it is unclear if this potential issue has been resolved through subsequent amendments. Further information on this matter is required from the applicant to assess the status of the HRA requirement.**

## Compliance with CP50 (no net loss etc)

The outline application was determined before mandatory BNG and before all biodiversity matters raised at outline were resolved. The approved parameter plans (Design and Access Statement (Pegasus Design, January 21)) and Landscape and Ecology Strategy (mhp, 11/10/21) are secured by condition, so the layout and landscaping are mostly fixed. As the outline was submitted before 12 February 2024, the development is not subject to statutory BNG. Although the submitted metric shows a habitat loss, there is very limited scope to add further habitat creation beyond the approved wildflower meadow, native tree, scrub and hedgerow planting.

2. **The northern compensatory grassland is also designed as public open space and a play area. A mown path will not prevent access across the wider grassland, meaning trampling and nutrient enrichment from dog walking are likely. This limits its value as biodiversity compensation. The development should therefore include measures to protect parts of the grassland so enhancement planting can establish and persist. Further boundary tree planting is also encouraged although this should not shade out the proposed grassland.**

Given the overall area habitat loss, proportionate protection of remaining grassland is necessary to mitigate impacts in line with CP50 and the NPPF.

### **Protected Species**

The most recent Update Preliminary Ecological Appraisal Report (Stark Ecology, June 2026) indicates that the site has limited potential for protected and notable species such as bats, badger, nesting birds, reptiles, amphibians and small mammals but that occasional occurrence of these species cannot be ruled out. Appropriate working methods and landscape management should be implemented to mitigate any impacts to these species during construction and operation. Discussion and Conclusions section of the Update Preliminary Ecological Appraisal Report (Stark Ecology, June 2026) provides some of these working methods. This document should be added to the list of approved plans.

Construction working methods should be submitted in the form of a CEMP/CMS to ensure that they are employed onsite during construction. A CEMP has been conditioned through the outline permission. A CEMP has been submitted in support of the reserved matters application and should be added to the list of approved plans once approved.

Long term management of any biodiversity compensation or enhancement onsite should be secured through a LEMP. A LEMP has been conditioned through the outline permission. A LEMP has been submitted in support of the reserved matters application and should be added to the list of approved plans once approved.

Suitable lighting design and layout should be secured through condition to avoid and limit any unnecessary light spill onto and beyond the site boundaries and any wildlife habitats created onsite. A lighting condition has been added to the outline application. This condition requires lighting to be approved during reserved matters. A Lighting Strategy (EDS, April 2026) has been submitted. This shows that external lighting is limited to that required for safe access and security. The proposed fixtures are all downward directional, and the accompanying lux plots demonstrate that horizontal illuminance from these fixtures will not extent into the boundary planting or beyond the development. This Lighting Strategy should be added to the list of approved plans.

3. **However, the outline lighting condition also requires details of construction lighting which has not yet been submitted. This would usually be included in the CMS and/or CEMP. Further information is required to discharge the outline lighting condition.**

### **Neighbourhood Plan**

The development is allocated for housing within in the local Neighbourhood Plan (Aldbourne Neighbourhood Development Plan 2020 – 2036 Aldbourne Neighbourhood, Part A, Made March 2023).

Also see related HRA comment above.

### **Biodiversity Net Gain (BNG)**

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). Based on the information available the biodiversity gain planning condition is not considered to apply to this application for outline planning permission was made before 12 February 2024.

*Note to case officer:* you should be satisfied that the proposals meet the above criteria and act accordingly. Further information will be required from the applicant prior to determination in the event the application is considered to be subject to mandatory biodiversity net gain.

**CONDITIONS:**

**Compliance with submitted documents**

The development will be carried out in strict accordance with the following documents:

- Update Preliminary Ecological Appraisal Report (Stark Ecology, June 2026)
- Landscape & Ecology Management Plan Revision P1 07.05.2026 Greenhalgh Landscape Architecture.
- Lighting Strategy (EDS, April 2026)

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

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

| Ecologist | Date |
|-----------|------|
|           |      |