



SB HOMES

07/09/26

Dear Jillian,

Further to the ecology consultee response, please see the following comments prepared in consultation with JCA Ltd, the Ecological Consultant.

Question/Comment 1

Design – it is recommended - due to the impact of the site will potentially have on water run-off, as well as to enhance biodiversity – that SUDs / attenuation ponds are considered to be added to the design. Please can the applicant, applicant ecologist, and applicant landscaping team offer commentary on this.

Response:

Thank you for your comments regarding the incorporation of Sustainable Drainage Systems (SuDS) and attenuation features within the proposed development.

S B Homes, along with the project ecologist and design team have reviewed the recommendation to incorporate SuDS features and/or attenuation ponds as part of the scheme. Whilst the biodiversity and drainage benefits of such measures are recognised, the site is constrained by its limited size and development requirements, and there is no realistic opportunity to incorporate attenuation ponds or other significant above-ground SuDS features within the developable area.

The proposed development has therefore been designed to make efficient use of the available land whilst ensuring that surface water drainage is managed appropriately through the site's drainage strategy. The detailed drainage proposals will ensure that surface water runoff is controlled and managed in accordance with the requirements of the Lead Local Flood Authority and other relevant consultees.

From a biodiversity perspective, the applicant has sought to maximise ecological enhancements where practicable within the constraints of the site. However, given the

scale and nature of the development, the inclusion of attenuation ponds or similar SuDS features is not considered feasible. Biodiversity enhancement and compensation measures will instead be delivered through the landscaping proposals and the Biodiversity Net Gain strategy, including the provision of off-site habitat creation and enhancement measures where required.

Accordingly, whilst the recommendation has been carefully considered, it is not considered practicable to incorporate attenuation ponds or comparable SuDS features within the proposed development without adversely affecting the viability and delivery of the scheme.

Question/Comment 2

Though degradation has been taken into account by means of methodology – it is not confirmed when degradation took place, and whether the data attained from Google earth pro was attained closer to the date prior to degradation. Please can information be provided from the applicant / ecologist for clarifications?

Image of the site with grassland, shrub, and trees can be seen on Google Earth in 2022.

Response:

The biodiversity baseline was informed by the ecological survey together with a review of historical aerial imagery available through Google Earth Pro.

The historical imagery review was used by JCA, however, the applicant is currently taking a further ecological opinion on this matter.

Accordingly, no definitive position is being advanced at this stage regarding any degradation or the final baseline approach. The applicant will provide any further clarification once the second opinion has been obtained and reviewed.

Question/Comment 3

Though options are presented of how to make up the shortfall, the applicant is yet to confirm how it will be achieved. Given the high level of habitat units' loss – a BNG Plan will need to be provided prior to determination.

Response:

S B Homes is committed to delivering the required Biodiversity Net Gain and is currently exploring opportunities to secure off-site habitat creation and enhancement measures on suitable land within close proximity to the Clough Road site. This approach accords with the Biodiversity Gain Hierarchy, with the applicant seeking to deliver genuine habitat creation and enhancement where possible to offset the identified deficit.

At this stage, discussions and analysis are ongoing regarding the suitability of potential off-site receptor sites capable of delivering the required biodiversity units. Should it not be feasible to secure and deliver sufficient off-site habitat enhancements, the applicant would seek to address any remaining shortfall through the purchase of appropriate biodiversity units and, where necessary, statutory biodiversity credits as a mechanism of last resort.

S B Homes therefore confirms their commitment to achieving the statutory Biodiversity Net Gain requirement and ensuring that the necessary biodiversity units are secured through an appropriate combination of off-site habitat delivery and/or purchased biodiversity units. Details of the preferred delivery mechanism and any associated legal agreements can be provided and secured through the Biodiversity Gain Plan process and any planning conditions or obligations deemed necessary by the Local Planning Authority.

Condition Suggestion

Bat Activity surveys, as recommended are to be completed prior to determination. These must be completed at an optimal time of year for bat surveys (April – August)

Response:

Thank you for your comments regarding the requirement for bat activity surveys.

JCA Ltd has reviewed this matter and prepared the attached letter dated 9 June 2026, which is submitted in support of this response.

As explained within the attached correspondence, the Preliminary Ecological Assessment identified the site as having moderate potential to support foraging and commuting bats and consequently recommended bat activity surveys to inform the detailed lighting design associated with the completed development. However, the recommendation was not made because the surveys are necessary to establish the principle of development or to determine the planning application.

Importantly, there are no buildings, structures or features within the site that are considered suitable to support bat roosts. As such, the proposed development would not result in impacts that would require a European Protected Species Mitigation Licence from Natural England.

The attached JCA letter explains that the principal ecological risk relates to the potential effects of operational lighting on bat activity following completion of the development. This matter can be appropriately addressed through the preparation and approval of a bat-sensitive lighting strategy prior to commencement of development, secured by planning condition.

The ecologist's suggested condition requiring a detailed lighting strategy to be prepared in accordance with recognised guidance, including the Bat Conservation Trust and Institute of Lighting Professionals guidance on Bats and Artificial Lighting at Night (2023), is

considered an appropriate and proportionate mechanism to address the identified ecological risk.

In these circumstances, and for the reasons set out in the attached JCA letter, it is considered that the application can be determined prior to completion of the bat activity surveys, with the detailed surveys and any resulting lighting design recommendations being addressed through the discharge of a suitably worded pre-commencement planning condition.

Please find attached the letter from JCA Ltd dated 9 June 2026 in support of this position.

Yours sincerely,

Sophie Byram