



Biodiversity made simple

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To whom it may concern,

I have been asked to review the Biodiversity Net Gain information submitted in support of this application and to ensure that the matters raised by Place Services have been properly addressed.

The concern appears to arise from an apparent difference between the habitat information shown in the Preliminary Ecological Appraisal prepared in August 2024 and the baseline information subsequently prepared in November 2025.

The competent person responsible for the November 2025 Small Sites Metric had not, at that stage, been provided with the earlier Preliminary Ecological Appraisal. That document has now been reviewed, and the baseline mapping and metric information have been checked and reconciled against it.

The revised information now:

- clearly shows the four existing buildings and records their footprints as Developed land; sealed surface;
- separately identifies the surrounding hardstanding as Artificial unvegetated, unsealed surface;
- records the grassland and woodland parcels in the manner considered to provide the most accurate reflection of the habitats present on site; and
- identifies the relevant north-south tree features as lines of trees.

For the avoidance of doubt, both Developed land; sealed surface and Artificial unvegetated, unsealed surface are assigned a biodiversity value of zero within the Small Sites Metric. The distinction between the building footprints and the surrounding hardstanding therefore does not generate any additional baseline biodiversity value and has no effect on the overall metric outcome.

The artificial unvegetated category has been used to distinguish the surrounding hardstanding from the buildings after the previous treatment of the entire area under a single Developed land; sealed surface category was not accepted. It should not therefore be suggested that the surrounding hardstanding must now be returned to that same single category. The revised approach provides a clearer and more precise representation of the different physical surfaces while preserving the same zero-rated biodiversity outcome.



The revised baseline map now aligns with the material habitat information contained in the Preliminary Ecological Appraisal. The earlier apparent discrepancy arose because the competent person had not been given that report when the original November 2025 information was prepared. It has now been resolved through review and reconciliation of the available evidence.

Having undertaken that review, the competent person considers that the revised grassland and woodland classifications provide a better reflection of the habitat parcels present on site, with the relevant tree features appropriately recorded as lines of trees.

For clarity, no biodiversity gain is now being claimed through enhancement of the woodland, and the metric does not rely on the woodland being improved to good condition. The required gains are secured principally through other habitat interventions and measures within the scheme. The woodland is therefore not being used as the principal mechanism for achieving the biodiversity gain requirement.

The applicant does not consider that any further survey or separate clarification from a suitably qualified ecologist is necessary. Place Services recommended that such clarification be provided by an ecologist, but did not identify this as a mandatory requirement. For the Small Sites Metric, the relevant requirement is that the work is undertaken by a competent person, and that requirement has been met.

The revised documents now provide a coherent and proportionate account of the buildings, hardstanding, grassland, woodland and tree features present on site. They should therefore be sufficient to resolve the outstanding concern and allow the holding objection to be withdrawn.

It is also relevant that national Planning Practice Guidance expressly requires a proportionate approach to Biodiversity Net Gain information. Paragraph 013, Reference ID 74-013-20240214, states:

“Local planning authorities should take a proportionate approach to these information requirements, focused on only necessary additional information, and integrated with wider information requirements on biodiversity and other environmental matters. Smaller developments should generally be subject to fewer information requirements than a major development unless the development would have an adverse impact on valuable on-site habitats. For example, on smaller sites where the existing habitats impacted have a low biodiversity value and the scope for on-site enhancements is limited, it may not be appropriate to request a substantive amount of information from applicants, and authorities may wish to rely on the minimum information requirements.”

This is a small-site application. The relevant baseline information has now been reviewed, corrected where necessary and fully reconciled with the earlier ecological material. No woodland enhancement gain is being relied upon, and the necessary gains are secured predominantly through other measures. Requiring additional professional input or further survey work, in the absence of any identified unresolved habitat issue, would not represent the proportionate approach required by national guidance.

Yours sincerely



Oliver Lewis CBE

