

Date: 05 March 2026
Planning ref.: SMD/2025/0247

To whom it may concern

Tean Leys Farm SWT Comments

Following comments received from SWT regarding the above planning application, please find below further explanation and clarification where this is required.

Documents required; please note that there are some updated versions of the viewed documents that have been submitted, although may not have been viewed:

- Application form
- Updated Ecological Impact Assessment- Clarkson and Woods, **March 2026. Figure 2, which was missing has now been added back in.**
- Biodiversity Net Gain Statement- Clarkson and Woods, **V6 November 2025; an erroneous sentence at 6.1.3, which did not reflect the remainder of the report has now been removed and updated. All other information within this document is considered to be correct.**
- Tean Leys Statutory Biodiversity Net Gain Metric- Clarkson and Woods, May 2025
- Site Location Plan- Island Green Power, April 2025
- Offsite Biodiversity Net Gain Area- Island Green Power
- Site Layout Plan- Island Green Power
- Landscape Masterplan- Lanpro, February 2025
- On-site HMMP Draft- Clarkson and Wood, December 2025
- Off-site HMMP Draft- Clarkson and Wood, December 2025

A request was made for the following information, which I have addressed below:

- Please supply the BNG condition assessments
BNG condition assessments are provided within the most up-to-date BNG Statement.
- BNG metric and report and HMMP do not match for off-site habitat, metric and HMMP says creation of mixed scrub and unsealed surface, the plan in BNG report shows creation of other neutral grassland. The value of biodiversity units also does not match. We will re-assess the BNG information when the correct information has been provided.
No Other Neutral Grassland (ONG) is due to be created under these proposals. The most up-to-date proposed BNG plan (submitted within the BNG Statement) shows the delivery of mixed scrub within the offsite-parcel to achieve a net gain for biodiversity of >10%.
- Please provide details of how the off-site habitat will be legally secured as a habitat bank
Section 1 of the full HMMP for the off-site parcel (issued in December 2025) states that A S106 agreement will be in place to secure the delivery of off-site BNG units (see: **Legal Agreement PB-B07).**

- If a S106 with SMDC is required to secure the off-site habitat, soil tests showing the soil is suitable to support other neutral grassland in moderate condition are required if the plan is to provide this habitat.

No ONG creation is proposed as part of the proposed development.

- Justification as to why the offsite provision is to be other neutral grassland - if the plan is to provide this habitat when it is between two woodlands and in a strategic area for woodlands.
- No ONG creation is proposed as part of the proposed development; the scheme will seek to deliver mixed scrub creation within the eastern portion of the off-site parcel, to provide a strategic connection between the existing woodland parcels.
- Confirmation is required that the development within 10m of the River Tean are temporary and will be restored within 2 years – only then can this be recorded onto the metric as not lost. Please clarify the rationale behind the extent of encroachment of both banks included in the BNG metric.

The section of the River Tean, which the cable route will fall within 10m of, is described as an artificial, reinforced channel next to a paved access road (Para 5.1.9 of the BNG Statement refers). The proposed works will be restricted to the section of paved access road only, >5m from the banks of the River Tean at any point. The CEMP will detail a robust construction methodology and pollution control measures, which will be strictly adhered to, to ensure that the river will not be impacted during works. Further, no areas of natural bank habitat will be impacted by the proposed work and, therefore, the proposed condition of the river will not alter as a result of the proposals, resulting in no change in the watercourse units of the BNG metric. We note the error in extent of encroachment for the banks of the River Tean, which have now been updated within the metric from:

- Watercourse encroachment: No encroachment → Major
- Riparian encroachment: Minor / None → Major / Moderate

This change has resulted in a change of the Total Net Change of Watercourse Units from +18.90% to +34.27% and has been reflected in an updated version of the metric, BNG statement and EcIA.

The riparian encroachment of the ditches is shown as Major/Major to reflect the intensive agricultural management present within 5m of each feature. This will be removed from the northern side of Ditch 2 following completion of the development, which has been reflected in the enhancement of the ditch within the BNG metric.

- Trees are shown on the baseline habitat plan but are not included in the metric calculation, please explain why. In addition, some of the hedgerows are mapped in the report as having trees (H5 and there appear to be additional trees mapped within H17 but in the key they are existing trees, not mapped as a hedgerow with trees – in the EcIA H17 is listed as ‘native hedgerow with trees’ but there are no hedgerows with trees included in the baseline metric calculations. Please explain why.

No trees have been included within the plans provided within the most up-to-date version of the reports. No trees will be impacted by the proposals, and are therefore not included within the metric. An earlier version of the mapping showed trees for ease of reporting, although this was subsequently removed.

H17, which was previously mapped as a ‘native hedgerow with trees’ has been subsequently relabelled as ‘native hedgerow’ due to a change in our understanding of how a hedgerow with trees is defined under the BNG metric since the initial walkover survey was completed in 2022. Due to the spacing of the trees, this

hedgerow was reclassified; however, since the feature will not be impacted by the works, this has not resulted in any changes to the calculations.

Further Detail; BNG

We believe that further concerns regarding the BNG metric, report and HMMP not matching up have been dealt with in the most up-to-date versions of these documents and any reference to Other Neutral Grassland creation completely removed. Scrub creation will be targeted within the off-site parcel, as opposed to woodland, with the intention that this will be more achievable in the shorter term, resulting in soil protection, improvement of the existing woodland ecotones, and providing wildlife corridors.

Further Detail; Off-site Delivery of BNG and HMMP

The off-site parcel will be registered as a Habitat Bank with Natural England and BNG secured through an S106 agreement.

The HMMP for the off-site parcel (issued in December 2025) details the management and monitoring plan for the parcel. This includes measures of success and remedial measures within the relevant sections. No ONG is proposed within the off-site parcel; grassland rides will be created within the scrub parcel, although these will not be seeded and allowed to regenerate naturally, and is included within the broader category of scrub habitat in good condition. An updated version of the Off-site HMMP will accompany this letter to better address the comments regarding interim monitoring targets.

The Draft HMMP for the Site (separate to the full HMMP for the off-site parcel) is expected to be finalised with full detail following the receipt of planning permission as an S106 is not required for this area.

We welcome the recommended planning conditions.

With kind regards



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