

04/06/2026

Dear Rich,

**RE – Advanced Proteins LTD SWT Comments DOC/2025/0061**

This letter in response to comments issued by SWT on 22<sup>nd</sup> April 2026 in relation to Discharge of Conditions 3, 7, 9, 11, 12, 14, 15, 18, 19, 21,22, 23, 24 for application SMD/2022/0088.

To date, Peak Ecology Ltd have undertaken the following survey types/assessments:

- Ecological Impact Assessment (EcIA), May 2025
- Biodiveristy Net Gain Assessment (BNG) and Metric, June 2025
- Habitat Management and Monitoring Plan - Offsite (HMMP), June 2025
- Construction Ecological Management Plan (CEMP), June 2025

Based on comments from SWT, the following two documents have been amended and re-submitted – further details/discussions on each condition below:

- Biodiveristy Net Gain Assessment (BNG) and Metric, May 2026
- Habitat Management and Monitoring Plan - Offsite (HMMP-Offsite), May 2026.

Conditon 14

14. No development shall take place until such time that a Landscape Maintenance and Management Plan (LMMP) has been submitted to and approved in writing by the Local Planning Authority including measures for its operation for the life of the development. The development shall thereafter be carried out strictly in accordance with the approved LMMP.

*SWT comments - The LMMP states that the offsite area is to be woodland planting with understory flora planting, in the BNG report and metric the offsite area is lowland meadow. The LMMP also says the offsite area is traditional hay meadow. There needs to be consistency across all reports stating what is proposed for the offsite area.*

*No information on the seed mix for the traditional meadow or soil tests provided to prove that lowland meadow is possible or for the modified grassland to other neutral grassland onsite. – or soil to be prepared accordingly*

*The green roof is not in the metric or BNG report, only the LMMP. In the LMMP the monitoring is proposed as a walkover survey after 5 years, then once every 10 years If the grassland enhancement is proposed on the offsite area, given the sensitivity of this habitat we would recommend more frequent monitoring in the first few years, to assess whether the habitat creation has been successful and implement remediation measures if needed.*

*Ditch is missing from the baseline survey map, and any management is missing from the LMMP.*

Peak Ecology Comments – the four ecology reports produced May/June 2025 (EcIA, BNG, HMMP-Offsite, CEMP) were intended to supersede all previous ecological submissions. However, Sightlines LMMP remains valid for onsite habitat creation, as it specifically addresses the management and establishment of habitats retained or created within the site boundary.

Our understanding is that the HMMP-Offsite report, which outlines the creation of lowland meadow habitat within the offsite area and aligns with the BNG Report and Metric, has not yet been reviewed by SWT. Following site surveys undertaken by Peak Ecology, it was determined that the most appropriate habitat creation within the offsite area would be lowland meadow, as this enhances the grassland already present onsite and aligns with the historic land use of the area. In addition, lowland meadow is a Priority Habitat, and its creation would deliver meaningful ecological benefits at the local scale. The establishment of a lowland meadow, using a seed mix selected for wetter ground conditions, was assessed as a more appropriate intervention than the previous woodland planting and is expected to deliver a higher likelihood of long-term success.

Once SWT has reviewed the HMMP-Offsite document, we anticipate that many of the current comments and queries will be resolved.

The green roof has now been incorporated into the updated BNG Report and Metric, (May 2026).

The ditch feature is absent from Sightlines LMMP baseline. During Peak Ecology's EcIA and BNG assessments, the ditch was mapped under UKHab as *g4, 50 – modified grassland, ditch*. The secondary code 50 within UKHab covers dry ditches, which aligns with the site observations.

Under the BNG Metric, a ditch only requires assessment as a watercourse if it holds water for more than four months of the year. As this ditch does not meet that threshold, it is instead treated as part of the area-based habitats, in this case modified grassland.

Because the grassland area containing the ditch will be lost under the current proposals, the ditch feature will also be lost. Consequently, no management or monitoring is required for this feature within the LMMP.

#### Condition 21

21. No development shall commence until such time that a detailed baseline survey together with habitat creation plans and timescales for the proposed off-site planting area shown on Drawing 478 PP 02 Rev B has been submitted to and approved in writing by the Local Planning Authority. The development shall subsequently be carried out in accordance with the approved details and timescale.

SWT comments - *Not received habitat creation plans with timescales for the off-site planting area. Condition cannot be discharged.*

Peak Ecology Comments – see Habitat Management and Monitoring Plan - Offsite (HMMP-Offsite), May 2026.

Condition 22

22. No development shall commence until such time that an updated Biodiversity Net Gain assessment using metric 3.1 (or subsequent revision) and reflecting the design changes has been submitted to and approved in writing by the Local Planning Authority. The updated and approved assessment shall be used to inform the landscaping scheme to be submitted under Condition 14.

SWT comments - *Please explain if the off-site area will be lowland meadow or woodland, if it is to be lowland meadow please provide details of how appropriate soil conditions will be created to achieve this habitat in the desired condition.*

*The pictures in the report are not clear so it is not possible to see the habitats on site. Can further pictures be provided?*

*January and February surveys are not an appropriate time of year for grassland surveys. As the original survey was carried out by Sterna Ecology in September, which is just within the appropriate time of year, the surveys should not need repeating.*

*The onsite ditch has not been included in the BNG metric.*

*The proposed green roof in the LMMP is also not included in the metric for BNG report.*

Peak Ecology Comments – please see Habitat Management and Monitoring Plan - Offsite (HMMP-Offsite), May 2026 to answer concerns regarding the offsite area.

See previous comments regarding the ditch and the green roof.

If you have any questions, please don't hesitate to contact me

Kind regards



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Senior Ecologist