

1. The UKHab Woodland and forest definition includes land with 25% or greater cover of trees that are 5m or more in height (with Scrub defined similarly but with woody species below 5m). Using the tree helper it would appear the proposed tree planting will lead to >25% cover therefore the proposed grassland may need re-classifying as woodland. If this is the case, there may be a requirement for offsite BNG.

This is not the case, I think it may just be someone misreading numbers which is absolutely fair when working with so many zeros! The individual trees have their own area and are considered separate from the grassland within the metric. However, even if you didn't consider the trees separately and you class them as part of the grassland, and you don't add the tree area to the grassland (all of which means you will get the biggest percentage of trees in the grassland possible), at the very most 25% of 0.0944 is 0.0236, not 0.01. The values for the grassland can be found in the habitat enhanced area of the metric and for the trees in the habitat baseline and creation tabs. It does not need to be woodland. If we did decide to make it woodland instead that would make the metric result better, not worse so offsite credits would still not be needed. It would not accurately reflect the habitat on site though and I would not feel comfortable classifying the urban trees as woodland.

Please could you clarify where the figures within the metric have come from for baseline tree area (0.003) and proposed tree area (0.007ha) totalling 0.01ha?

The area for both proposed and retained trees should be used in the calculations. 17 trees in total are depicted in the proposed habitat map within the BNG report. From using the Tree Helper in the 'Main Menu' worksheet within the metric, 17 trees (assuming they are small), results in an area of 0.0692ha. The proposed grassland area is 0.0944ha, of which 25% is 0.0236ha therefore the tree canopy cover will be greater than 25% by our estimate.

The UKHab states the definition for 'Woodland and forest' as "Land with $\geq 25\%$ cover of trees that are ≥ 5 m in height." This would imply that the trees cannot be considered separate from the grassland once cover is $\geq 25\%$. At this point the land would be classed as woodland rather than grassland.

To determine the size of trees for use with the Tree Helper, the diameter at breast height should be measured and cross-referenced to the information contained within the BNG user guide (p62).

If canopy cover is $\geq 25\%$ then one option may be to plant fewer trees to keep canopy cover below 25%. An alternative option might be to split the grassland into two parts, the southern portion containing the majority of trees could be reclassified as woodland while the remaining grassland could be enhanced.

2. The '2025.11 Landscape Plan' doesn't align with the BNG report maps or metric, please could this be updated? It includes a shrubbery and 9 trees as opposed to the 11 trees depicted in the proposed habitat maps in the BNG report.

In the report it states "Tree planting shown on the post-development habitat plan below is indicative only and does not represent the precise location at which each tree will be planted, or the precise number required. Individual planting positions will be finalised at the detailed design stage and will be informed by site constraints such as services, levels and existing features. Planting will, however, be retained within the habitat parcel in which it is shown on the plan, such that the areas and habitat types used in the Biodiversity Metric calculation remain unaffected by any variation in the exact positioning of individual trees." I have however adjusted the plan to only show 9 trees, but if it doesn't exactly match in locations, this is why.

On further consideration, if the grassland is classified as woodland then the individual trees will not need to be mapped.

However if it is retained as grassland with trees then please could you update the maps within the BNG report so that the number of trees, both retained and proposed, align with the 2025.11 Landscape Plan.

The '2025.11 Landscape Plan' also includes a shrubbery, if this is not the intention then please could this be updated.

3. Areas of bulb planting have also been mapped in the Landscape Plan, if this is still the intention then they will need to be mapped and included in the metric separately as they can't be counted as a vascular plant. Alternatively it may be easier to avoid planting them.

The bulb planting is not in the metric, but will probably positively boost biodiversity. Honestly, leaving them in would be great, but there is no current provision within the BNG metric system to plan out areas like this. AS such, I think the client intends to remove them.

We agree and we would be happy to leave these in but the metric does need to match the maps.

4. Please could the length of the ornamental hedge near the buildings be updated in the metric and if possible in the maps as well. Aerial photography can be used to trace features, using this it would appear the hedge is twice the length it has been mapped as.

The non-native hedgerow was measured using GIS from government LiDAR data and using industry standard cartesian projection. It is more accurate than google earth measurements. It also makes no difference to the metric given that it is a

non native poor quality hedgerow that is being removed and that better quality species rich mixed native hedgerow will be planted elsewhere on site. The legal requirement for BNG is 10%. Hedgerow improvements are at almost 150%. This seems to be a non-issue.

We also looked at the photos in the PEA which appears to show the hedge extends to the corner of the northern most building which it does not do in the maps. However, looking at older satellite imagery, it would seem the remaining section may be a wall or fence that vegetation has colonised. All habitats present on site should be included in the baseline maps including built linear features. Please could you clarify what the linear feature is and update the maps and metric accordingly?

5. While the habitat conditions stated in the metric appear to be correct, they don't align with the condition assessments. Some of the criteria in the condition assessments for both grassland and hedgerow are incorrect, please could these be updated.

This is the one we do not understand, as I used the condition assessments to do the metric. Nothing on the site can be described as good or even moderate quality habitat and this is reflected in the metric. There is nothing that needs to be changed, and everything is as it should be so we cannot understand why this is an issue.

It may be that we are looking at different versions of the condition assessments, I have attached the most up to date copies that we have. Please could you send any revised assessments preferably in excel format?

Within the grassland condition assessment, based on the comments, D and F should state 'yes' and we would like to confirm that C has been understood correctly as it is similarly phrased and the comment is ambiguous.

Within the hedgerow condition assessment, based on the comment, B2 should state 'yes' and we would like clarification as to why in C1 the adjacent grassland does not constitute ">1m width of undisturbed ground".

6. A twice yearly hay cut with arisings removed is recommended in the BNG report. As the grass will be long and may be considered untidy by members of the public, can we confirm with you that the landowner is happy to go ahead with this?

This has been confirmed with the client, they are happy to do this. We discussed doing a mixed sward cut to show that the longer areas of grass were deliberate and to allow wildflowers to set seed, so that members of the public would understand it was for wildflowers and not just think it was "unkempt".

Thank you, this comment has been resolved.

7. While the application form was updated correctly, any changes to the pre-development value will need to be reflected in the form. Once the metric has been finalised please could the application form be updated too?

(This one isn't Bombus, I just wanted to confirm there are no changes to the metric so the same one needs to be used with the report added to this email)

This will depend on the outcome of the other comments.

8. Seed mixtures EM1, 2 and 7 as recommended in the BNG report are most likely to be successful on soils with lower fertility. A British Wildflower Seed mix rather than Emorsgate may be a more suitable option particularly a mix containing shade tolerant species, found

here: https://britishwildflowermeadowseeds.co.uk/collections/loamy-soils?page=1&phcursor=eyJhbGciOiJIUzI1NiJ9.eyJzayI6InByb2R1Y3RfdGl0bGUiLCJzdil6IldpbHRzaGlyZSBOZXV0cmFsIFNvaWxzIE1lYWVvdyBTZWVke1peClslmQiOiJiliwidWlkjozMjl0OTk2MzU3NzQ5MywibCI6MTYslm8iOjAsInliOiJDRFAiLCJ2ljoXLCJwLjoxfQ.CLdRt5u_-7oGx4ORcG_6VMJjGWmXuhjLI_jajGd3YOk

When recommending seed mixes, I always look at the overall soil quality within the area of the site to make sure that the seed mixes I recommend are likely to successfully take. Emorsgate seed mixes are considered the gold standard and as such are the main ones all ecologists will recommend, but this does not mean they are exclusively the mixes that need to be used. The other suggestion from the SWT is also fine, and they are reputable and do include fully native species (some wildflower mixes that say they are native include introduced species which is why we often recommend a specific make and mix to avoid the introduction of non-natives or naturalised species.

Emorsgate are indeed often recommended. Our suggestion was based on the fact that it is currently modified grassland so we have assumed that the soils are enriched, hence the suggestion of seed mixes that will tolerate some higher fertility soils. We'd be happy for the Emorsgate mixes to be used if soil tests are done to show that these are suitable and will be successful.