

15 December 2025

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Dear Tina,

Warren Crest Farm, Wick Hill Lane, Planning reference: 251233

I write to you in regard to the comments on Ecological Impacts Assessment (EcIA) and Biodiversity Net Gain (BNG) Assessment made on 18/11/2025. This letter is to accompany the amended EcIA and BNG reports, which explain decisions on habitat classifications and protected species recommendations, to robustly assess the potential impacts of the proposals at Warren Crest Farm.

For ease of reading, Ecology by Design keeps the same headings as used in the 18/11/2025 comments and references where in the amended reports justification can be found.

Baseline Habitats

In line with the guidance, the baseline habitats were recorded as individual habitat parcels to avoid under-recording the biodiversity within it (rather than simply recording it as the low-distinctiveness 'Urban – vegetated garden' habitat type). The BNG metric User Guide states: *"All features which are recorded within a private garden at baseline, which will remain within a private garden post-development, may be recorded as retained. This includes where a private garden is split into separate private gardens post-development"*. It goes on to say that *"When assessing habitat changes within a private garden, you should not:*

- *record the creation of any new habitats as anything other than 'urban – vegetated garden' or 'urban – unvegetated garden' habitat types*
- *record the enhancement of any habitats recorded within the baseline"*.

Accordingly, the combined area of (now) 0.139ha of PR1, PR3 and PR4 marked as 'retained' in the baseline are either outside the zone of impacts or due to experience only temporary impacts:

- ~0.01ha of PR1
- ~0.094ha of PR3
- ~0.035ha of PR4

The Baseline Habitats plan is revised to include explicit parcel boundaries and parcel labels for clarity, and an Impacts plan for the site is now included to show the extent of impacts (EcIA Appendix 1).

Grassland

UKHab requires the 'other neutral grassland' meet at least 3 of the following criteria:

1. >20% broadleaved herbs and sedges;
2. >8 species per m² (including forbs, grasses, sedges and rushes, excluding bryophytes);
3. ≥1 grass species not generally sown for intensive agricultural production at least abundant (e.g., rye-grasses, timothy, cock's-foot, meadow fescue); and
4. cover of rye-grasses and white clover, where present, is <30%.

Quadrat data representative of each grassland parcel was collected during the site visit on 12th May 2025. The data are included in the EcIA Appendix 2 and summarised in the table below to evidence the classification of these parcels as 'modified grassland' rather than 'other neutral grassland'.

'Other neutral grassland' criteria	PR1	PR2	PR3	PR4
>20% broadleaved herbs and sedges	Meets	Meets	Fails	Fails
>8 species per m ²	Fails	Fails	Fails	Fails
≥1 abundant+ non-agricultural grass species	Fails	Fails	Meets	Meets
<30% cover of rye-grasses and white clover	Fails	Fails	Meets	Meets
Number of criteria met	1	1	2	2

It is also important to note that the majority of the site is already (and will remain) residential curtilage, and that the areas around the farmhouse form a private vegetated garden. Review of historical mapping and satellite imagery identified the house and garden as built in the 1970's, so the vegetated garden (and habitat parcels within, visible on historical satellite imagery) precedes 2020 by a few decades.

Orchard Habitat

The DEFRA Traditional Orchards Habitat Action Plan Inventory 2024 is acknowledged as a screening tool; however, as DEFRA confirm, not all polygons are ground-truthed. Identification in the Inventory does not override field survey evidence. The EcIA assessment is based on detailed habitat assessment of trees, ground flora, and management evidence, as required by UKHab.

The UK BAP Traditional Orchards Priority Habitat describes intensive orchards in contrast to traditional orchards as *"orchards managed intensively for fruit production, where there are inputs of chemicals such as pesticides and inorganic fertilisers, frequent mowing of the orchard floor rather than grazing*

or cutting for hay, and planting of short-lived, high-density, dwarf or bush fruit trees (stems generally 75cm or less)."

We do not consider PR5 to meet the BAP or UKHab criteria for traditional orchard because:

- The consistent pattern of annual intensive pruning to maximise fruit production and to restrict the height of the majority of the 14 trees to <4m (rather than longevity of the trees).
- The base of each tree is raised in a small mound, indicating intensive management for herbicide purposes as well as drainage.
- The orchard floor is a continuation of PR3 (heavily mown modified grassland, with sward <4cm), rather than being grazed or hay-cut.
- The trees are planted in a compact grid, with canopy separations <2m, indicative of high-density production planting.

The UKHab Intensive Orchard definition states that intensive orchards often have young trees or dwarf stock; the trees on site have heights of 2–4m and stems <7.5cm diameter at breast height (too small to meet the definition of a tree in BNG metric). In any case, the defining distinction between intensive and traditional orchards is the intensity of the management, not the presence of young or dwarf trees.

A soil analysis is not required for orchard classification under UKHab or BAP. Habitat classification relies on orchard structure, management intensity and species composition, all of which were assessed in detail. Soilscape does identify the site as supporting Soilscape 6, which comprises 'Freely draining slightly acid loamy soils', which is reflected in the species identified in the grassland quadrat data for PR3 (abundant Yorkshire fog and white clover, both of which do well in Soilscape 6 soils).

The tree species on PR2, PR3 and PR5 have been re-verified against the AIA schedule, and a plan for clarity is included in Appendix 3 of the amended EcIA.

Based on orchard structure, planting density, intensive pruning, frequent mowing, herbicide treatment and modified grassland substrate, PR5 does not meet the BAP/UKHab definitions of traditional orchard and does meet the UKHab definition of intensive orchard.

We therefore maintain the submitted classification. The client has nevertheless agreed to change the classification to traditional orchard and, since new habitats other than 'Urban – vegetated garden' cannot be created within residential curtilage, to compensate for the full orchard area elsewhere on the farm.

Rural Trees, Hedgerows and Lines of Trees

In line with the BNG metric User Guide, the habitats underneath the tree canopies of individual trees (whether on or off site) were recorded, as these are within the redline boundary. The trees that are

outside the redline boundary are off site and were therefore excluded from the metric as they are to be retained and protected from the works (including through the use of Root Protection Areas). Furthermore, it is standard practice for the AIA to include offsite trees for site context and calculation of Root Protection Areas, hence their larger site plan and apparent inconsistencies with the BNG site plan, which is restricted to what is within the redline boundary.

The metric, and EclA Tables 4.2 and 5.1 and Section 5.6 have been amended to include these, however, and to upgrade the strategic significance of the boundary features, as requested. As requested during our meeting on 12th November 2025, self-set sycamores T34 and T35 are now retained under the proposals, and line of trees L2 and native hedgerow H1 have now been combined into a single feature: a native hedgerow with trees H1. These requested edits have resulted in changes to the site area as well as in the baseline value of the site.

Cropland/Herb Garden

We recognise your request that the herb garden be classed as 'Urban – allotment' due to fruit/vegetable planting despite being for residential purposes only and not rented to local people. We have reassessed this area as requested and updated the metric, and EclA Tables 4.2 and 5.1 and Section 5.6.

Vacant or Derelict / Sparsely Vegetated Urban Land

We agree that the percentage of bare earth and ivy ground cover in the parcel doesn't meet the UKHab definition of 'vacant or derelict land', however there isn't an equivalent BNG category for UKHab's 'sparsely vegetated urban land'. We have updated the metric and EclA Table 5.1 and Section 5.6 to call this area 'introduced shrub' as requested.

Biodiversity Metric

We have taken on board the requested amendments as outlined in this letter and the amended EclA report. We further note two additional comments in the metric issued to us as part of the 18/11/2025 comments, addressed below:

- The access track leading to T18 has been re-drawn to match as shown on the 2025 tree constraints plan (Figure 2, Appendix 1). The area originally mapped was an estimation of size on the ground, as it is not visible on the aerial/satellite imagery due to canopy cover, and Ecology by Design does not produce CAD drawings. This change has led to a reduction in area, reflected in the updated metric.
- H2 is a non-native and ornamental hedgerow, a hedgerow type that has its condition fixed at 'poor', regardless of how many criteria it passes.

Mitigation Hierarchy

Alternative layouts to the house were considered, and the proposed layout submitted is the siting that avoids and reduces the number of trees and extent of orchard habitat to be lost in line with the mitigation hierarchy. Where comments relate to building size or room numbers, these will be referred to the Applicant as they fall outside ecological remit, though ecological constraints have been fully considered at every iteration of the plans.

R2: Native Planting, LVIA & Landscape Plan

It is again important to note that the majority of the site has been and will remain residential curtilage, and therefore the proposals must reflect what is ecologically realistic and policy-compliant for this land use (habitat enhancements or creation within residential curtilage cannot be secured under BNG). Avoidance and enhancement measures must be feasible within the intended land use and not impose obligations that fundamentally conflict with that use in order to comply with 'creating a net gain legacy' as required by the BNG Good Practice Principles.

For example, recreating a traditional orchard within private residential curtilage would not be compatible with the normal management regime or resident expectations of a domestic garden setting, which has been the case for the site as existing. Compensation measures should be proportionate, achievable and appropriate to site function. It is considered that ecologically meaningful BNG gains for this site can be more effectively delivered through creation in the wider farm's blueline boundary where they are compatible with long-term land-use and management. For this reason, a proposed habitats plan is not included in the amended report, as it is currently in the early design stages while planning permission is secured. Such a plan will be submitted once planning is granted as part of a planning condition discharge.

The impact of the planting proposed in PR2 is discussed in the revised EcIA Section 5.3.4, while the impact of the loss of the cypress hedge H2 on wildlife is discussed in EcIA Section 5.5.1.

Compensation for the loss of mulberry tree T32 is secured through the BNG metric.

Protected Species Impacts Mitigation

A non-licensed method statement for bats as was approved in previous planning application 241564 has been included in the revised EcIA (Recommendation R5).

We trust that the above clarifications, together with the revised plans and metric, will enable agreement on the baseline and the acceptability of ecological impacts.

Yours sincerely,

Sofia Sanchez Piccone, MSc. ACIEEM
Senior Ecologist