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To: [Development Management](#)
Subject: Planning application 25/00681/TDC Land to south of Church Avenue
Date: 08 August 2025 10:53:10

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Hi Anna

Thank you for consulting the GMEU

Summary

Further information and clarifications are required on BNG and wildlife are recommended

Lack of an Ecological Appraisal

At permission in principle stage, I accepted that the site was low risk, owing to the extensive data collected for the adjacent Stakehill site, but recommended a preliminary ecological appraisal be provided at technical details. Whilst a BNG assessment has been provided that covers the habitats present, no information on the level of risk to wildlife has been provided or with regards to issues such as invasive species.

I therefore recommend an assessment of the site for wildlife and invasive species issues prior to determination.

Contributing to and Enhancing the Natural Environment & Biodiversity Net Gain (BNG)

Section 187 of the NPPF 2024 states that the planning policies and decisions should contribute to and enhance the natural and local environment. 10% BNG is mandatory under Schedule 7A of the Town & Country Planning Act 1990 (as inserted by schedule 14 of the Environment Act 2021). The development will result in the loss of an abandoned allotment undergoing natural succession and trees. These will be replaced by development, gardens and soft landscape proposals outside of the proposed gardens. Whilst no information on wildlife has as yet been provided, it is likely to include loss of bird nesting habitat.

A BNG assessment has been provided, but no metric. This indicates 10% net gain is achievable on the site. There are however discrepancies between the landscape proposals, planting schedule, BNG post development plan and BNG assessment with regards post development landscaping and in particular the number of trees proposed around the site, with the landscape plan showing by Westwood Landscapes dated May 2025 appearing to show nine trees, the planting schedule by Westwood design May 2025 indicating 16 trees the BNG proposals plan June 2025 appearing to show 17. The BNG assessment stating in paragraph 4.4.1 that 42 rural trees will be planted. As no metric has been provided I am unclear which figure was used in the metric.

There is also a debate to be had whether it is correct to define the site as an allotment under UK HAB as based on google earth it has been abandoned prior to 2020 and prior to that only parts of the site utilised since 2000. I would regard the habitats currently on site, primarily it would appear other neutral grassland as the more appropriate baseline habitat.

I therefore recommend that prior to determination:

- Justification for the baseline being an allotment is provided ie evidence that it has been utilised as an allotment within the last 2 years, otherwise the baseline should be recalculated utilising the existing habitats present;

- Clarification on the correct post development layout and;
- Provision of the metric.

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Planning and Transportation

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