

Dear Ade,

I am now writing in response to the ecology comments dated 23-06-2026 and have the following response;

Outdated Survey –

I have attached an updated Ecological Appraisal dated 10-07-2026 received from Dr Lee Brady, Calumma Ecological Services, see attached.

Great Crested Newts

The applicant has decided in consultation with the Ecological Advisor to go down the district licensing route. If you can confirm that the application is being looked upon favourably then Applicant will begin the process to have the initial enquiry form prepared and submitted to NE. My understanding is that the DDL application form is only prepared once the development has received planning permission.

Biodiversity Net Gain

I have received the following response from the appointed consultant for consideration;

It is my understanding that the proposed hedgerows fall within the curtilage of the proposed dwellinghouse.

The BNG User Guide states:

“The post-development private garden has no public access, and biodiversity net gains cannot be legally secured. As these gains cannot be secured you should only record habitats created within private gardens as either:

- *‘urban – vegetated garden’; or*

- *‘urban - unvegetated garden’*

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”*

On this basis, in order to ensure compliance with the User Guide, the proposed hedgerows within the private curtilage are shown as part of the Vegetated Garden. No hedgerows are proposed within the BNG Enhancement area.

With regards to tree T2, there is a structure present at this location. However, it was noted that this measured less than 5m in height (approximately 4m at the time of survey) and therefore does not meet the definition of a individual tree. This was therefore treated as scattered scrub which does not need to be included as part of the metric calculations. Although this scrub may well develop into a tree over time, it was also not shown as created tree for the same reasons above with regards to habitat creation in private gardens. It is noted that the PEA also only references trees which are “adjacent to the building.” and does not make any reference to this feature which stands away from the building. An aerial image is also provided below which shows greenery at this location but does not indicate presence of a tree:

