

GMEU comments to the updated BNG

BNG assessment:

There are some discrepancies between the report and the metric. It appears that the report is mostly stating the previous BNG scores prior to the update of the metric, as below:

- The BNG totals in the Executive Summary (including the screen grab of the table) are not in line with the updated BNG scores for habitats.
- Table 3.2 – artificial unvegetated land area is incorrect
- Table 4.1 and paragraph above – does not match the updated BNG scores in the metric for habitats
- Table 4.2 – does not match updated BNG scores

The above should be amended in the report for completeness.

Other than the above minor discrepancies in the report, the BNG assessment appears to be accurate, and I have no reason to doubt the information provided. The proposal is resulting in a loss of 0.18 habitat units (-90.25) with a trading rules error. As per the BNG report, 10% net gain is not considered to be feasible on-site as the proposal is for dwellings and private gardens only. Therefore, the applicant will need to purchase off-site units to make up the shortfall and to satisfy the trading rules, and this must be evidenced to discharge the Biodiversity Gain Condition. As no habitats are proposed on-site (except for private gardens), a management plan, such as a 30-year Habitat Management and Monitoring Plan (HMMP), would not be required for this application.

Biodiversity Gain Condition

The statutory **Biodiversity Gain Condition** will apply should this planning application receive permission. To discharge the condition, the following is required: Biodiversity Gain Plan (using DEFRA template), final BNG metric including on-site and off-site information (off-site information must be filled in by the off-site unit provider), evidence of the off-site unit provider (including gain site reference number) and the off-site units must also be allocated to this application on the Biodiversity Gain Sites Register. Please see [Biodiversity net gain - GOV.UK](#) for how this should be dealt with on the decision notice.

Ecological Recommendations

The recommendations made in my initial comments (13/01/26) relating to Japanese knotweed removal, nesting bird checks and biodiversity enhancements are still applicable.

Summary

In summary, minor amendments are required to the BNG report to match the updated metric. Provided this is done, GMEU will be satisfied that this application can be forwarded to determination and that any permission if granted is supported by the conditions recommended above, including the statutory Biodiversity Gain Condition.