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Chief Executive
The Environment Bank

By email

Mr Brian McCutcheon
Medway District Council

06 December 2012

Biodiversity offsetting to compensate for nightingale habitat loss at Lodge Hill

Dear Brian

You will have seen the many comments from stakeholders received by email on the final draft of the Lodge Hill offsetting report. We have considered these, and the comments made at the November stakeholders meeting, carefully and made changes to the report – the final version of which is attached. Our overall conclusion is unchanged however and we independently advise you that there is indeed a reasonable prospect of offsetting providing adequate compensation for nightingales at Lodge Hill.

I attach below, for you and all stakeholders, a table summarizing the comments received (which are all in the public domain) and our responses to them. For some stakeholder comments our responses are brief and are set out only in the table below; for others, where a more substantive response was appropriate, we have noted it in the table and set out the full response below. For ease of reference, we thought it would be helpful if these were all in the same document and could be lodged, as with the other previous documents, on the Council website.

Yours sincerely

Dr T E Tew

Stakeholder	Date	Action/Comments	EBL response
Medway Council	14 Nov	Final draft report emailed to all stakeholders	
RSPB	19 Nov	Query to Medway as to whether stakeholder comments would be made available to Inspector in entirety – Medway affirmed	
Bioscan	26 Nov	Technical queries on areas of habitat and multipliers used	Responded answering all technical queries 26 Nov
Natural England	26 Nov	Technical queries on areas of habitat and multipliers used	Responded answering all technical queries 26 Nov
Graham Warren	26 Nov	Planning queries on timescale, comment on using Defra metric for species	Comments noted and copies went to all stakeholders – as Graham noted, these planning matters are outside the scope of EBL report.
Bioscan	27 Nov	Further technical queries on areas of habitat and multipliers used	Responded answering all technical queries 29 Nov
Margaret Snow, FWCA	28 Nov	Creating habitat elsewhere still constitutes local loss; other local sites have been lost; Lodge Hill is nationally important; offsetting is speculator; Council policy to avoid temporary loss	These matters are largely outwith technical offsetting but the report now explicitly references the Council policy on temporary loss. As we note elsewhere, the general considerations of offsetting do not negate the environmental views of local stakeholders who care deeply about the local benefits of this site - this is a matter for planners to weigh against other arguments for development
Owen Sweeney, MCF	28 Nov	Substantial comments, particularly focused on offsetting risks, temporary loss, SSSI status and planning matters	Response below
Judith Ashton	30 Nov	SSSI status, temporary loss, deliverability, habitat based metrics	All reflected in amendments to main report or covered elsewhere – e.g. see response to RSPB
Greg Hitchcock, KWT	30 Nov	Substantial comments – focused on temporary loss and deliverability	Response below
Liz Mason CBRE	30 Nov	Substantial comments	Response below
Bioscan	30 Nov	Substantial comments	Response below

MCF Comments

Dear Owen

Thank you for your email of 28 November setting out MCF's comments on the final draft of The Environment Bank report on offsetting of nightingale habitat at Lodge Hill. I respond to your numbered comments as below.

3. We note your comments on the national status of the species, there are a variety of figures in circulation relating to different spatial scales and timeframes, we would always revert to the BTO analyses set out in their report.

4. The status of Lodge Hill has been recognized in the report, as have the challenges in successful delivery of habitat compensation.

5 et seq. We have never claimed that habitat creation has been proven, nor that success at any one site is guaranteed, and have never been "dismissive" of the many uncertainties, that's why the proposals for offsetting use multipliers based on Government metrics. We note your conclusion that offsetting will not compensate for Lodge Hill but disagree with it.

10. The designatory status of the site, and its consideration in planning, is a matter for Natural England and the planning authority.

12 (& 16). We amended the record of the meeting to reflect your concerns, recorded a lack of consensus and, in the revised report, have given significant weight to the issue of temporary habitat loss and specifically noted and referenced both the habitat clearance issue and Medway's stated policies on temporary loss.

14. We have repeated many times the distinction between 'technically feasible' and 'measures in place to assure delivery' – we have not been asked to compile the latter. Your views on permanent loss with respect to the temporary loss are noted – as we note elsewhere there is no consensus on this.

15. There is no intention to "smooth away" issues relating to designated sites or temporary loss. I refer in some detail to the issue of the applicability of offsetting to this site and this species in our response to the RSPB below.

17 et seq. As you note, these general planning matters are directed at Medway Council and the Inspector – The Environment Bank has no locus in these matters.

Kent Wildlife Trust comments

Dear Greg

Thank you for your email of 30th November 2012 setting out Natural England's response to the final draft of The Environment Bank report on offsetting of nightingale habitat at Lodge Hill. Our response on your comments is as follows:

1. We have inserted a disclaimer as requested.
2. We were assuming that the question 'can you deliver?' was nested within 'how would you deliver?' but are happy to acknowledge your point that the former has not yet been answered.

3. Delivery of offsetting schemes is indeed likely to be via conditioning of planning, but that is not an issue we have yet been asked to address. Timescales in that process will be highly case-specific and dependent on resource input.
4. Other stakeholders too are sceptical that receptor sites could be found – but we stand by our opinion that there seems to be widespread and abundant potential whilst recognising the points that you and others make about deliverability.
5. Your point on habitat functionality is a good one, also made and responded to elsewhere; the habitat metrics do not cope with this nuance directly. As a general principle however, I would have thought that sites specifically managed for nightingales should be more functionally suitable, for longer periods, than sites such as Lodge Hill which are not.
6. Your points on temporary loss are noted and extensively dealt with elsewhere.
7. We have now noted your point on the displacement of birds potentially increasing conspecific competition elsewhere in the main report.
8. Long-term monitoring and enforcement of offsetting schemes might indeed be done by The Environment Bank using civil contract law but these are matters for the planning authority to consider in their enforcement powers.
9. We have added a further reference to mulching in the main report.
10. We have checked with Thomson Ecology and the areas reported as Lowland Meadow UKBAP habitats in the BAP habitats map referred have been classified as poor semi-improved grassland. They may have once fulfilled the criteria as Lowland Meadow, but no longer do so due to lack of management which has caused scrub encroachment and dominance of grasses. For this reason, these grassland areas can also not be described as MG5 grassland of SSSI standard, and this was recently confirmed during Thomson Ecology visits with Natural England. Therefore the distinctiveness bands assigned are appropriate.

CBRE Comments

Dear Liz

Thank you for your email of 30 November 2012 setting out Natural England's response to the final draft of The Environment Bank report on offsetting of nightingale habitat at Lodge Hill. Our response on your comments is as follows:

We note your support for the process and agreement with the overall conclusions reached.

There may be doubt over the national population estimates for the species but the BTO estimates to date are the best we have and in any case the population size does not have a direct bearing on the offsetting calculations.

We note your comments on the relative compensation estimates provided by the offsetting metrics versus Natura2000 site casework but we are here simply applying the Defra metrics to determine a solution.

Your comments on the conservative nature of the assumptions made, and on the temporary loss of habitat and phasing of development are noted, and provide the counterview to many of the other stakeholders – we will not comment further on them here. We have tried to be conservative in our assumptions, to reflect the fact that spatial, temporal and delivery risks are all inherent in the future delivery of an offsetting strategy – our overall conclusion is that there is a reasonable prospect of an offsetting strategy working at Lodge Hill.

Your specific comments on the main report have all been noted and we have made amendments where we have considered it appropriate to do so.

Natural England Comments

Dear Rob

Thank you for your email of 2 December 2012 setting out Natural England's response to the final draft of The Environment Bank report on offsetting of nightingale habitat at Lodge Hill. We note that your comments are largely supportive of the approach and process, and note also Natural England's agreement with the overall conclusion that habitat compensation has a good chance of success.

Your comments on distinctiveness and time lag are noted. The condition assessment methodology captures nightingale occupancy assigning good condition to the component and adjacent habitats if present. The offset requirement for the scenario where component habitats occupied by nightingales are of high distinctiveness irrespective of the habitat distinctiveness band has been estimated and included in the report, based on previous comments. However, having already applied both high distinctiveness and good condition for nightingale occupancy in this scenario we suggest this is an overestimation of the offset requirement. We have added an expanded section on delivery lag and amended the report to include these for each component habitat. The report has also been amended to include a 10 year delay for creation or restoration of all scrub habitats. Scrub growths of 8-15 years are known to be used by nightingales. The 10-20 years to develop scrub reported refers to nutrient-poor soils. The site-selection protocol criteria includes nutrient rich soils to minimise the time delay of habitat availability for nightingales at potential offset sites.

We recognise and share the grounds for optimism that Natural England express, but we have not shirked from setting out the delivery risks and challenges in habitat creation - the detail of which lies in the next phase if Medway decide to proceed further.

In which event the mix of habitat creation and restoration will become clearer as the receptor sites are identified and agreed upon – we agree however that natural regeneration looks to be favoured and that this is ‘creation’; the Defra multipliers between creation and restoration in fact represent a general rule of thumb that greater delivery risk pertains to creation – we would need to assess these delivery risks on a case by case basis.

Technical difficulty multipliers are applied to mitigate the risk of success or failure of expansion or recreation projects for habitats, including the time that such habitats would take to develop. Very high/impossible multipliers are generally for habitats that take considerable time to develop or where considerable complexity is involved e.g. blanket bog, limestone pavements. We agree that there are no case studies of deliberate habitat creation for nightingales, however there is evidence of nightingales colonising suitable habitats that have been created when available, which provides support for medium difficulty for creation works. Delivery risks in general are of course key to any future offsetting strategy – we have noted a wide variety of responses from other stakeholders on the likelihood of nightingale colonization; our overall response is perhaps best summarized by acknowledgement that ‘adaptive management focused on future nightingale use’ is key.

RSPB comments

Dear Samantha

Thank you for your email of 1 December 2012 with comments on the final draft of The Environment Bank report on offsetting of nightingale habitat at Lodge Hill. Your ornithological comments are most helpful in considering the practicalities of any potential offsetting scheme, which has not previously been attempted for nightingales, and I am grateful to the RSPB for the time spent. However, your letter contains several general assertions which invite a discussion wider than the specifics of whether the offsetting calculations at Lodge Hill are appropriate and we think it is helpful to respond both generally and specifically.

1. Can we reaffirm (and particularly for the attention of other stakeholders who have written to us on this matter) that we were not asked to answer the question “Should development proceed at Lodge Hill?” but rather “If development does proceed at Lodge Hill, is there a reasonable prospect that it can be offset?” Many of the comments we have received invite The Environment Bank to comment on the planning issues, both general and specific, but that is not part of our brief. Issues such as the delivery of mitigation hierarchies and the timing of sustainability appraisals are for you to raise with Medway Council as you see fit.

2. In the offsetting process, the final quantification of how much replacement habitat would be needed cannot be done until the actual receptor sites are specifically identified and agreed upon, because the risk multipliers in the metric relate to specific site characteristics. We have not yet sought to identify and agree specific receptor sites because that is a significant piece of work that would only

proceed once the principle has been accepted. So whilst your comments in Annexes 2 & 4 which relate to specific site constraints and habitat characteristics of receptor sites are welcomed and helpful, they would really come into focus only in the next phase of the work (see 6 below).

3. As you know, 'biodiversity offsetting' through applying the new Defra metrics on offsetting is simply a tool for planning authorities to allow them to be (more) transparent, consistent and accountable in their decision-making when considering biodiversity loss or gain. Local Planning Authorities have a number of general duties to consider biodiversity, and the NPPF stresses both the need for development to be 'sustainable' and the potential use of off-site compensation to achieve that. A type of offsetting has been delivered in practice by LPAs for decades now, it's just that the metric seeks to bring some rigour to the process and the announcement of offsetting pilots in the White Paper gives Government support to trialling different methodologies to look for best practice so as to deliver much more biodiversity gain than the current system is doing.

It is our understanding that a policy initiative announced in a Government White Paper is 'Government policy' – but we have amended the words in the main report. We also note that, in legal terms, offsetting using the metrics was considered by Planning Authorities and the Planning Inspectorate to satisfy proper process (The Planning Inspectorate Report to the Secretary of State for Communities and Local Government. TCPA 1990 S78 Appeals by Paul Newman New Homes against the Decisions of Aylesbury Vale District Council and Central Bedfordshire Council 21 October 2011).

4. With regards to whether offsetting should be used for SSSI casework The Environment Bank supports Defra's general principle that offsetting should not be used to undermine or compromise site protection mechanisms. In our opinion, offsetting is designed for, and has the largest role to play in, recognising, evaluating, and compensating for environmental impact on low ecological land where previously none has been forthcoming. Offsetting should not be used to compensate for environmental impact that cannot be compensated for – that is to say, for impacting upon habitats or species that are irreplaceable or are rare or threatened. An effective (but not infallible) way of guiding planners as to what is 'irreplaceable or rare or threatened' is SSSI status, since SSSI designation applies to areas that are nationally important.

But more substantively, in evaluating whether offsetting may be appropriate we should consider the site, the habitat and the species concerned:

- Is the site a 'jewel in the crown' of British wildlife? Natural or semi-natural, pristine and devoid of significant human intervention over a significant time period? - nature conservationists and society consider such sites should not be developed. No. Lodge Hill is a post-industrial former MoD base that has been allowed to scrub-over through neglect and which birds have colonized.
- Is the habitat irreplaceable – very hard to create or restore? or one which would take centuries to do so, such as peat bog. No. The Lodge Hill habitat

to be lost is a mixture of scrub and woodland which naturally regenerates almost anywhere in the absence of management intervention.

- Is the species rare or threatened – restricted to a few sites, unable to move or colonise new areas, or rapidly declining across its range, restricted by highly sensitive habitat requirements or widely impacted by human activities – a rare orchid or beetle? No. Notwithstanding its current ‘amber-listed’ UK status, the nightingale is a common bird, with a vast global range covering millions of square kilometers, that is sustaining its population across most of its range and has a world population of c. 50 million birds. It is a short-lived but mobile migrant and a natural colonist, that prefers early to mid-successional habitat, with a life history strategy that is therefore adapted to high natural turnover of populations and sites.
- We think everyone has accepted that Lodge Hill is currently an important site for nightingales, certainly regionally and possibly nationally. There is no clarity as to whether it is a source population for neighbouring areas – it might well be, but equally it might be a sink population with limited breeding success. There are no data on breeding success to inform this.

In general, therefore, when considering the characteristics of the site, the habitat and the species, all the indicators suggest that this is a situation where appropriate habitat creation offset could provide good compensation for environmental impact through habitat loss. That is the general conclusion of the BTO report and was the general conclusion we reached at the stakeholder workshop. Furthermore, the SSSI status itself is not clear. As we understand it the Executive Board of Natural England were explicitly invited to notify the site recently and chose not to do so, but this certainly doesn’t preclude them from so doing as and when new data become available. Again, the status of the site is for Natural England to determine and for the planning authority to consider; it doesn’t affect the offsetting calculations. Consideration of the actual characteristics of the site therefore lead us to conclude that offsetting is appropriate in this case.

5. You reiterate your view that too much emphasis is being given to the habitat-based metrics approach compared to the species-led expert approach in both design and outcome. The Environment Bank report is of course based on the habitat metric that we were asked to apply, so that is what we have done. As we have stressed all along, the metric has not been designed to cope with species, but that evolution has always been recognised as a possibility and we are doing so here to the best of our ability with welcome input from expert ornithologists. We can only reiterate that the habitat metric is simply another (although we believe preferable) tool for planners that now exists alongside a) accepting the opinion of ecological consultants employed by developers b) accepting the opinion of experts opposed to the development and c) accepting the opinion of independent experts.

6. You put forward ‘well-established’ principles for compensation measures (which of course illustrates the fact the habitat compensation is not a new idea) and they are sensible, and are dealt with by the Defra metric multipliers on spatial, temporal and delivery risk.

7. Your comment that the report “at all stages takes the optimistic rather than the realistic position” is, we believe, incorrect. In the face of uncertainty we have in fact taken rather conservative positions on, *inter alia*:

- the condition assessment methodology, where all habitat parcels occupied by nightingales were assigned to a ‘good’ condition category - the maximum condition category that can be assigned. Further, habitat parcels contiguous and adjacent to nightingale occupied territories were also deemed to be in good condition as there was uncertainty regarding habitats and area sizes comprised within nightingale home ranges. The inclusion of neighbouring habitat parcels as components of a nightingale territory is a cautious approach to ensure that the lack of ecological information surrounding nightingales does not lead to the underestimation of the impacts of development upon the nightingale population at the Lodge Hill site;
- all habitat types present at the site, with the exception of buildings and hard surfaces (tarmac), were included in condition assessment and the calculations to estimate the credit requirement of the impact of the development project. This is based on BTO predictions that all nightingale territories within the non-designated areas of the site will be lost.
- with creation options the target condition of habitats of ‘medium’ and ‘high’ biodiversity distinctiveness at the offset sites has been limited to ‘moderate’ as there is no available information regarding the offset sites and management plans that would allow a ‘good’ target to be set. The application of a ‘moderate’ condition target is a cautious approach until evidence can be provided that would allow the target condition to be amended.

We’d note also that other stakeholders have criticized the report for being too conservative. You give the example of “failing to draw attention to the obvious negative factors associated with some of the receptor sites” but we always stressed that the receptor sites brought forward were simply to test whether there might be available habitat to restore. We believe there is a realistic probability of being able to find sufficient compensatory offset habitat that would provide a secure and long-term future for nightingales.

8. Finally, to note two areas that the RSPB and others have highlighted that The Environment Bank agree are significant issues to be considered were any offsetting scheme to proceed.

- a) Temporary loss of habitat. It is not for The Environment Bank to comment on whether temporary loss of nightingale habitat is deemed by the Planning Authority to be acceptable in this case – but we can definitely say that temporary loss would be unavoidable given the current development schedule. On the basis of the BTO advice received, we disagree with your opinion that temporary habitat loss will necessarily lead to permanent reductions in nightingale populations. Separately, expert opinion through the stakeholder workshop (and as summarized in your Annex 3) seems to be moving towards the view that natural regeneration is highly desirable and that the period for habitat to become functionally available to the birds is at least 15 years – we have reflected this in the main report.

- b) Receptor site availability, habitat, tenure and cost. We have not, and do not, downplay the importance of applying the best criteria possible (for habitat type, management, tenure, ownership and cost) for receptor site selection and management. These all relate to the assurance that habitat offsetting not only *could*, but **would** deliver biodiversity gain – this would naturally centre on the species-based outcomes and adaptive management that conservation managers are increasingly adept at. If it were decided in principle that offsetting were to proceed, much more work would be necessary to decide how and where that would happen in a way to satisfy everyone that biodiversity gain were to be delivered – the analyses in Annexes 2 & 4 typify this sort of work.

This is not a straightforward case and there is certainly more work to be done in relation to sourcing appropriate sites. But, if the decision is made to develop the site, and given the characteristics of the site, the habitat and the species, the availability of potential receptor sites, and the requisite funding (through the purchase of offset credits) and determination to succeed, we think there certainly is ‘a reasonable prospect of adequate compensatory habitat’ for Lodge Hill being brought forward. It would provide the delivery mechanism for replacing an overgrown MoD site used serendipitously by colonizing nightingales without any long-term management plan with a very exciting huge and well funded landscape-scale restoration project that has long-term nightingale conservation at its heart.

We have actioned many of your specific comments on the report as you set out in your annex 1 – you will see the changes reflected in our final version and summarized in the table below in the order they are set out in your table. Thank you once again for the RSPB’s considerable time and expert consideration in this matter.

RSPB comment	EBL response
P3 para 3	Report amended.
P3 para 3	Report amended
P3 para 3	‘SSSI discussion’ – referred to in main response
P4 para 3	Report amended
P6, para 3, bp 4	Report amended
P6, para 3, bp 5	Noted, but others disagree – RSPB view explicitly set out in main report
P6, para 3, bp 6	Misunderstand ‘risk free’ – report amended
P6, para 3, bp 1	Noted
P7, para 1, bp 1	Report amended
P7, para 1, bp 3	Report amended
P7, para 1, bp 4	Noted
P8, table 1	Noted
P9, para 1	Noted
P9, para 2	No point duplicating text The additional nightingale-specific criteria applied for assessment as used by EBL and developed with the BTO are clearly provided in the methodology section of Appendix 2.
P9, para 2, bp 1	Noted
P9, para 2, bp 3	These comments seem to be based on the assumption that desk-top site identification and preliminary visits were formalized and part of

	long-term management planning – as described, it was not. If the next phase proceeds then these comments are entirely valid.
P9, para 2, bp 6	There is no point in identifying specific sites for the reasons RSPB set out – there has (thus far) been no exhaustive check against specific criteria, and we are not claiming it.
P9, para 3	As above
P10, para 1	It is certainly possible, but not ‘equally likely’
P10, para 2	Noted. Medway policies have now been explicitly referenced in the main report.
P10, para 3	The issue of temporary loss and the development schedule is referenced several times in the text.
P10, para 5	Noted. The BTO quote is now referenced and RSPB’s disagreement is now explicitly set out in the main text
P10, para 6	Noted – though we don’t think the words are misleading
P11, para 1	Noted
P11, para 1, bp 4	Noted
P11, para 1, bp 6	Noted, report amended in conclusions
P11, para 1, bp 7	Report amended
P11, para 2	Noted
P11, table 2	RSPB comments and annex noted – referred to in main response
P12, para 1, bp 1	The RSPB’s disagreement is noted in the main report
P12, para 1, bp 2	As above
P12, para 1, bp 3	The Defra metrics do not make these assumptions – the multipliers for temporal lag address this
P12, para 1, bp 4	The RSPB’s comments are valid, in so far as we have never claimed the process to do what RSPB says it doesn’t do. We (and others) think the initial search suggests that the potential for habitat creation is huge, and our conclusions are well founded
P12, para 1, bp 5	Temporal issues are indeed significant, we have stressed this in the report – the comment addresses a planning issue
P12, para 1, bp 6	RSPB’s disagreement is noted in the report

Bioscan comments

Dear Dominic

Thank you for your email of 30 November 2012 with comments on the final draft of The Environment Bank report on offsetting of nightingale habitat at Lodge Hill.

We note your opinions set out in the covering letter and associated annex which bemoans the effort that has gone into the Environment Bank offsetting metric process when, you state, we already had a habitat compensation figure provided by the BTO and should instead have made more progress on identifying suitable receptor sites. We have clearly failed to convince you of the rationale for this over the course of two day-long workshops so won’t try again here in writing.

We have separately replied to your queries on the metrics by email, we note elsewhere in this summary of our response to stakeholders why we disagree with your conclusion that we are reducing the offsetting burden and other stakeholders have in fact suggested exactly the opposite.

We are sure your exhortation for Medway Council to look for alternatives to Lodge Hill, and your criticisms of the process adopted to date, will have been noted by them.

Your comments contain areas of discussion wider than the specifics of whether the offsetting calculations at Lodge Hill are appropriate. See EBL response to RSPB concerning appropriateness of offsetting at Lodge Hill.

A key aspect of offsetting to ensure no net loss of biodiversity is to establish the equivalent replacement habitat which needs to be created. The identification and establishment of offset sites is a complex process, as the RSPB have stated in their comments, and this process was, from the outset, not expected to be completed and secured by the time of submission of the report. A key criterion to be applied in the site-selection process is the current nightingale distribution in Kent which will not be available till early 2013.

We consider the habitats at Lodge Hill to be recreatable and appropriate risk multipliers have been applied. We have stated that there is not a guarantee that offset habitats will be colonized by nightingales, however creating the proposed offset requirements across several spatially appropriate areas set within the core range of nightingales in the UK increases the probability of successful colonization. Spatial multiplier application is dependent on the spatial location of the offset site and, considering that the site-selection process developed will eliminate sites that do not contribute to ecological networks, we do not believe it is appropriate to apply them here.

The duration of management commitments would aim for 'in perpetuity'. The 25 years refers to the minimum management agreement for the purposes of the calculations for offset requirements.

The EBL report addresses the offsetting requirements for nightingales specifically and the temporal multipliers are appropriate for nightingales. The development proposal avoids and retains the ancient woodland on site and it would not be appropriate to consider applying multipliers for ancient woodland as this issue is not being examined here.

Your comments on the considerations for receptor sites are noted.

Your comments in relation to guiding principle (vii) are noted.

Your comments in relation to guiding principle (viii) are noted.

The guiding principle (ix) refers to the pooling of small offset requirements to deliver a larger habitat block and is not relevant to Lodge Hill. Your comments regarding the offsetting strategy for Medway are noted.

You state that the balance of 'favourable' against 'unfavourable' modifications (in terms of reducing the offset burden) suggests an element of 'cherry picking' and refer to a modification which increases offset burden and the spatial multipliers

which has been addressed above. Establishing an offset requirement is addressed on a case-by case basis and the guidelines offer a range of ways in which risks can be incorporated into the calculations.

Your comment about 'resurrecting elements of old draft methodology' refers to the inclusion of 'very low' biodiversity distinctiveness for buildings and hard surfaces (technotopes) for ease of reference, which does not impact upon the calculations in any way as technotopes are not given ecological value in any of versions of the Defra guidelines - this does not, as you claim, "allow the dismissal of low grade habitats from trade up calculations".

In summary, we disagree with your opinion that offsetting appears to conflict with offsetting guiding principles for the reasons explained above and have noted your concluding comments.