

From: Amanda Jenkins <slincsfens@lincstrust.co.uk>
Sent: 26 January 2022 11:32
To: Buttery, Lucy
Cc: _planningadvice
Subject: H06-0960-21, Hydroponics facility at Norfolk House Farm, Main Rd, Gedney Drove End.

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Hello Lucy

Thank you for inviting Lincolnshire Wildlife Trust to comment on the above application.

We have no objection to the planning proposal but raise the following points:

Biodiversity Management Plan

We commend the developer for commissioning a Biodiversity Management Plan to ensure the longevity of biodiversity benefit on site.

All recommendations in the Ecological Assessment and Biodiversity Management Plan should be conditioned.

Measurable Biodiversity Net Gain.

The Environment Act 2021 received royal assent in November 2021. The Act mandates delivery of at least 10% biodiversity net gain (BNG) above the sites pre development baseline value of biodiversity. For further information on BNG see the [Greater Lincolnshire Nature Partnership](#) and [Local Government Association](#) websites.

The National Planning Policy Framework (NPPF 2021) states in paragraph 179b: To protect and enhance biodiversity and geodiversity, plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing *measurable* net gains for biodiversity.

For major development applications a standard biodiversity metric (DEFRA Metric 3.0) should be used to calculate the current level of biodiversity at the proposed development site and what needs to be delivered to ensure an overall net gain (at least 10%) within the development site, or beyond the site, if on site development cannot be secured. We would like to see how net gains have been included within the submitted plans and Design and Access Statement.

Net gains for biodiversity should contribute to the wider ecological network and the wider environmental landscape. Developers and Planning Authorities should be aware of local biodiversity strategies such as biodiversity opportunity mapping, local nature recovery

strategies and biodiversity action plans. Please contact the Greater Lincolnshire Nature Partnership for further details on biodiversity opportunity mapping.

Observations on application H06-0960-21 – 30ha of land at Gedney Drove end.

- No Biodiversity Net Gain Calculation was included in the planning application.
- No wildflower grass species mix has been included on the landscape plans.
- Landscape plan suggests that new hedging will be cherry laurel, which is a non-native species. Native species hedging of known value for wildlife should be planted. These should complement the existing woodland and hedgerow features around the site. See Woodland Trust for species options.
- Ash trees are suggested. This isn't a sustainable choice given the prevalence of Ash Die Back contact the Forestry Commission or Woodland Trust for advice. Any trees planted should complement the native species woodland to the north and around the development site. They should be native and of known value for wildlife and sourced from a tree nursery that can guarantee local provenance.
- Lighting – has been identified within the ecological assessment: Any lighting required during construction and/or operation of the Site should be directed away from hedgerows and woodland (further information is provided in Lighting in the UK, Bats and the Built Environment Series, Bat Conservation Trust and Institute for Lighting Engineers). This should be conditioned.
- As stated in the ecological assessment ditches around the site could be used by water vole and otter. A minimum 5m vegetation buffer will be retained from the top of the ditch banks and therefore impacts will be avoided. Any drainage into ditches may require further ecological survey and assessment.

Thank you again for the opportunity to comment on this application. Please do not hesitate to contact me if you have any queries or need clarification regarding the comments provided.

Yours sincerely
Amanda

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