
From: Hill, Grace <Grace.Hill@e-lindsey.gov.uk>
Sent: 16 April 2026 10:12
To: Niland, Mark
Cc: _planningadvice
Subject: H09-0306-26 - ecology comments

Hi Mark,

Please see below our comments regarding this application.

H09-0306-26 - Bakkavor Sluice Road Holbeach St Marks Spalding PE12 8HF
Proposed demolition of existing temporary classroom building & erection of new classroom

Summary: We will require a LERC search to be provided pre-determination so we can assess the impact on any protected/notable species locally. We are confident that 10% net gain will be achieved onsite for this application, however further alterations are required to be made to the BNG proposals pre-commencement. We will require a Biodiversity Gain plan, an HMMP and a finalized metric to be provided pre-commencement. The authority should secure the HMMP with a S106 agreement due to the significant onsite habitat creation proposed. Please see below for further details

Documents reviewed:

- BNG Statutory Metric
- PEA and BNG Assessment

Comments

Ecological Considerations:

- We support all mitigation and enhancement recommendations provided in section 6, pages 13-14 of the PEA and request that they are required by condition.
- We believe that the habitats on site have the potential to support nesting birds. It is an offence under Section 1 of the Wildlife and Countryside Act of 1981 (WCA 1981) to intentionally take, damage or destroy the nest of any wild bird while it is use or being built. Therefore, we request a condition requiring that: Works should not be carried out in the main nesting season (March 1st – August 31st). If not possible then a suitably qualified ecologist must perform a breeding bird survey of the site prior to any works beginning onsite. Any active nests discovered during inspections will be protected with a suitable exclusion buffer (of appropriate size to the species) to prevent disturbance and monitored until the nest is no longer active / all chicks have fledged, when the ecologist will provide a sign off for clearance work to continue.
- We will require further presence/absence badger surveys to be conducted on site pre commencement and request a condition with the following wording to be set at discharge.
 - A Badger presence/absence survey is required pre-commencement. No vegetation clearance or groundwork shall be carried out until further surveys are carried out by a suitably qualified ecologist at the appropriate time of year to assess badger clan territory and determine sett activity. The survey should be updated to reflect conditions immediately prior to commencement of works (no more than 3 months prior) and submitted to the authority for approval. Where the survey identifies the presence of active badger setts, or evidence of badger activity that would be disturbed or damaged by the development, the following must be submitted to and approved in writing by the Local Planning Authority:
 - A detailed mitigation strategy (including protective fencing, creation of sett buffers, and safe foraging corridors).
 - Evidence that a sett disturbance licence application has been obtained from Natural England if the destruction or closure of a sett is required.

- All works shall be carried out in strict accordance with the approved mitigation strategy, including recommendations listed in sections 4.1.4 to 4.1.11 of Heatons's Badgers report (dated November 2024), and any conditions imposed by the Licence.
- Reason: To ensure that badgers, and their setts, are protected during the construction and operation of the development in accordance with the Protection of Badgers Act 1992 and local planning policies."
- Due to the scale of the proposed development, we will require a full Lincolnshire Environmental Records Centre (LERC) search to be conducted pre-determination which may show any populations of protected or notable species locally that could be impacted by the proposed development.

BNG Comments and Notes to applicant

- Overall we are confident that 10% net gain can be achieved for this site, however we have issues with the current BNG proposals that need to be corrected pre-commencement.
- We require the habitats surrounding the solar arrays to be altered to comply with the UK habitat classification system version 2.01 which states that developers should: Record the strips of [solar] panels as u1b6 [Developed Land; Sealed Surface, a habitat which does not deliver Biodiversity Units] and the strips of vegetation in between the rows separately.
 - Following these guidelines we have estimated that the total area covered by the solar arrays would be roughly 0.5375 ha. This area should be recorded in the created habitat tab of the metric as 'developed land/sealed surface'.
 - That would mean that roughly 0.8224ha would still remain in the created habitat tab as 'moderate condition other neutral grassland (ONG)'.
- We request that the habitat created between the solar arrays be altered from 'ONG in moderate condition' to 'ONG in Poor condition' or 'Modified grassland in Moderate condition' due to the relative complexity of creation ONG mod under these conditions. If the habitat ONG poor is created, then 11.61% net gain can still be achieved for this site with 3.06 units being created by this habitat creation.

Specific BNG condition request

- We will require the following documents to be provided pre-commencement
 - Biodiversity Gain Plan
 - Finalised Metric
 - Habitat Management and Monitoring Plan
- To be in line with national guidance, the authority should secure the HMMP and corresponding biodiversity creation/enhancement with a S106 agreement. This is because of the relatively large amounts of significant on-site habitat creation/enhancement proposed, which includes 0.822ha of "Other Neutral Grassland" habitat in "poor" condition (3.06 units).

Conclusion: We will require a LERC search to be provided pre-determination so we can assess the impact on any protected/notable species locally. We are confident that 10% net gain will be achieved onsite for this application, however further alterations are required to be made to the BNG proposals pre-commencement. We will require a Biodiversity Gain plan, an HMMP and a finalized metric to be provided pre-commencement. The authority should secure the HMMP with a S106 agreement due to the significant onsite habitat creation proposed.

Please get in touch if you have any further questions,

Kind Regards,

Grace Hill

Bsc(Hons) | MRes

BNG Ecologist

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