

From: Hill, Grace <Grace.Hill@e-lindsey.gov.uk>
Sent: 08 January 2026 12:02
To: _planningadvice
Subject: FW: H09-0442-25 - Land Off Battlefields Lane South Holbeach Spalding - Updated BNG/Ecology Reports to address comments

Hi,

Please could you upload this consultation response below to the public portal. Thanks in advance.

Kind Regards,

Grace Hill

BNG Ecologist

South & East Lincolnshire Councils Partnership

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Please note that any informal opinion expressed in this email is without prejudice and is not binding on the Council during the consideration of any formal application.

From: Hill, Grace
Sent: 27 November 2025 15:08
To: 'Chance, Jennifer' <Jennifer.Chance@sholland.gov.uk>
Cc: De-Ruyck, Chris <Chris.De-Ruyck@e-lindsey.gov.uk>
Subject: RE: H09-0442-25 - Land Off Battlefields Lane South Holbeach Spalding - Updated BNG/Ecology Reports to address comments

Hi Jen,

Please see below our comments concerning this application following the updated documents.

H09-0442-25 - Land off Battlefields Lane South Holbeach Spalding PE12 7PG

Hybrid Application for 158 Dwellings Comprising:- Full Application for the Erection of 62 Dwellings, Associated Landscaping and Infrastructure and Outline Application for the Erection of Approximately 96 Dwellings (Some Matters Reserved).

Summary: The applicants have submitted an amended and accurate BNG assessment that satisfies the requirements for the full/phase 1 portion of this hybrid application. However, we also require the applicants to submit an updated metric file that includes the amendments made to the post-development habitat targets (grassland in poor condition). Note that a finalized HMMP, metric, and biodiversity gain plan secured via s106 agreement (as described below) will be required to discharge the biodiversity gain condition for phase 1 pre-commencement, along with evidence indicating that 2.37 off-site units have been purchased.

In regard to the outline application (phases 2 and 3), the applicants are required to submit an additional stand-alone metric assessment that includes the baseline biodiversity calculations for the entire site boundary of the

outline application (details below). Therefore, there has not been sufficient evidence provided to enable the authority to determine whether 10% BNG will be achieved for the outline application.

Comments

- Phase 1 BNG Comments and notes to applicant
 - We thank the applicants for making the suggested alterations within the BNG assessment, and we believe that the applicant has now provided a thorough Biodiversity Net gain assessment for the full application part of this hybrid application, which indicates that 2.37 offsite habitat area units will have to be secured to achieve 10% BNG for phase 1 of the site. However, these changes have not been amended to the statutory metric, and therefore, we will require the applicants to submit an amended metric reflecting the above pre-commencement.
 - The information included in the HMMP, which is contained in the BNG Assessment is broadly adequate, however, I believe that greater detail should be provided regarding the methods used to establish and maintain the “other neutral grassland” ONG3 habitat parcel. For example, the nitrogen and phosphorous levels are certainly too high on this arable land to maintain the required species diversity for ONG, and will therefore require specific management actions, e.g., 2 years of growing a suitable break crop to mow and remove cuttings to reduce nutrients prior to sowing the species rich grassland (see https://cdn.forestresearch.gov.uk/2022/02/bpg_15.pdf as an example).
 - In addition, we also request that the following be included under the compliance check section:
 - Specific wording should be inserted into the HMMP to trigger the start of the 30 year BNG clock, e.g., “**habitat creation and enhancement works in accordance with the Habitat Management and Monitoring Plan will be completed no later than 12 months after the completion of development work.**”
 - The authority will require a **Biodiversity Gain Plan** and an updated **HMMP** to be submitted pre-commencement.
 - To be in line with national guidance, the authority should secure the finalized HMMP and corresponding biodiversity creation/enhancement with a **S106 agreement pre-commencement**. This is because of the relatively large amounts of significant on-site habitat creation/enhancement proposed.
- Phase 2 BNG comments
- We commend the baseline habitat maps provided for phase 2 and 3 of the development, however, we require the applicant to submit a metric assessment that includes calculations of the baseline biodiversity value for the whole outline boundary.
- In addition, it would also be greatly beneficial if the applicant provides a scheme specifying how 10% BNG for each phase (or the site in its entirety) is going to be met, e.g., through onsite, offsite, purchasing off-site units, or some combination of the above. The precise details (e.g. landscaping and post development habitat maps) are not statutorily required for phases 2 and 3, but the authority requires information such that we can be confident that 10% BNG will be achieved for the whole site (e.g., 10% for each phase, 25% in phase one and 5% in phase two and three, 30% in phase 1 and 0% in phase 2 and 3, etc.).
- Once this has been provided, we will have greater confidence in the outcome of this BNG assessment and can provide further comment on the scheme.
- Lastly, we would like to query the proposed outline plans for Phase 2 and 3 as seen in P1003 OP Site Plan Plain, and we highly recommend that the site plans are altered to retain or enhance the higher biodiversity value habitats that are located on the southern boundary of the site. This would enable phase 2 and 3 of the development to accord much better with the mitigation hierarchy, which prioritizes avoiding impacts to existing habitats (as which was done in the first phase of the development).

Conclusion: The authority requires the applicant to submit either a combined metric (covering all 3 phases of the full and outline application), or an additional stand-alone metric that includes the baseline biodiversity calculations for the entire site boundary of the outline application. Therefore, there has not been sufficient

evidence provided to enable the authority to determine how 10% BNG will be achieved for this entirety of the site.

Note that a finalized HMMP and biodiversity gain plan secured via s106 agreement (as described above) will be required to discharge the biodiversity gain condition for phase 1 pre-commencement, along with evidence indicating that 2.37 off-site units has been purchased.

Please get in touch if you have any further questions,

Kind Regards,

Grace Hill

BNG Ecologist

South & East Lincolnshire Councils Partnership

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