

Burrell, Becky

From: Pinna-Morrell, Gillian
Sent: 01 September 2025 14:46
To: _planningadvice
Subject: General Enquiry

Hi, can you please attach the e-mail below to application H09-0442-25 as Ecologist consultation response with the code 2STAND, thanks.

From: Hill, Grace <Grace.Hill@e-lindsey.gov.uk>
Sent: 01 September 2025 14:40
To: Pinna-Morrell, Gillian <Gillian.Pinna-Morell@sholland.gov.uk>
Cc: De-Ruyck, Chris (ELDC) <Chris.De-Ruyck@e-lindsey.gov.uk>
Subject: H09-0442-25 ecology comments

Hi Gillian,

Please see our comments for this application below. Apologise for the delay in getting them to you.

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: We require further baseline BNG assessment information covering the entirety of the outline application boundary, and therefore there has been insufficient BNG information provided to determine this application. However, we are confident that mandatory 10% net gain can be achieved for the initial phase of this development through securing the appropriate number of offsite units pre-commencement, noting that the habitat target issues outlined below must be resolved before we can determine the number of off-site units required. These details should be finalized as soon as possible to minimize uncertainty and potential delays when the applicants seek to discharge the general gain condition. Lastly, we will require an HMMP and BNG gain plan to be submitted and approved pre commencement, and the authority should seek to secure the proposed onsite biodiversity provision and HMMP via a s106 agreement.

Documents reviewed:

- BNG Statutory Metric
- Environmental impact assessment
- BNG Assessment

Comments

Ecological Considerations:

- The applicant has provided thorough ecology documents therefore in my judgement providing sufficient ecological data for the application. We support all mitigation and enhancement recommendations provided by the ecologist in the PEA.
- Greater provision for other bird species is required to improve the biodiversity outcomes of the site and mitigate the loss of habitat post development. For example, best practices suggest that universal nest boxes (either integral to the buildings or external) should be provided at an equivalent ratio of 1:1, e.g., 3 on every third house, etc., see: <https://cieem.net/swift-bricks-the-universal-nest-brick-by-dick-newell/>. These should be located throughout the site as appropriate following best practices and an ecologist's advice. These boxes are low-cost, are incorporated seamlessly into the buildings construction, and provide suitable habitat for multiple bird species that occur in urban areas.
- Similarly, the provision of integral bat boxes on dwellings and installed in trees should be greatly increased in compensation for the loss of foraging habitat. I suggest that a minimum of 30 integral bat

boxes / roost units should be installed on dwellings or in trees throughout the development in appropriate areas following best practices and an ecologist's advice.

- In both cases, the authority requires the applicant to submit sufficiently detailed maps that indicate the proposed location of bird/bat boxes on-site.

BNG Comments

- The applicant has provided a thorough Biodiversity Net gain assessment and a sufficient Biodiversity Net Gain Statutory Metric therefore in my judgement providing sufficient baseline BNG data for the full application half of this hybrid application. However, the authority requires baseline BNG information submitted for the whole outline boundary, as well as a plan 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 needed for the whole site, but we need baseline BNG information and a scheme indicating how the developer intends to meet 10% 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.).
- Overall, the baseline biodiversity assessment and metric calculations appear rigorous, and currently indicate that 10% net gain for hedgerow units can be achieved onsite and at least 2.24 offsite habitat units will have to be secured to reach the 10% net gain for this section of the site. However, here is an issue here revolving around the applicant's strategy to creating "modified grassland" habitat in "good" target condition to achieve the 10% BNG requirement, and I am concerned that this is an unrealistic target to achieve. A clear/legible baseline map indicating the proposed location of the grassland habitats would help us come to a balanced conclusion about the feasibility of achieving "good" target condition. . From the outset, we would not wish to undermine a project's efforts to achieve modified grassland in a high target condition, however, I do wish to highlight to planning officers and developers some of the implications of accepting this management target in the metric assessment:
 - Achieving the "good" target condition as currently proposed in the metric's post-development biodiversity estimates will require continued effort to create, monitor, and manage this habitat type over the long term (e.g., sowing with appropriate species rich mixture, no mowing of these habitat blocks Mar-late July; complete removal of cuttings every one to two years (every year initially), etc., and there will be little room to adjust management regimes to meet the needs of residents over the 30 year period (e.g., demand for short grass amenity spaces, hay fever sufferers, pets, etc.,).
 - In using the "good" condition criteria score in the metric, I would argue that there is a higher risk of not achieving the desired biodiversity outcomes and the development consequently failing to achieve the mandatory 10% BNG than if a lower, more easily achieved habitat condition score was used in the metric, which would provide some buffer against this risk of failure. To provide context, there are roughly 0.09 biodiversity units accrued to this grassland habitat creation in the metric. This value would reduce to approximately 0.08 units if we concluded that "other neutral grassland" in "poor" condition would be more likely to be achieved for any/all of the "modified grassland" parcels.
- These are the ecological constraints on achieving the desired target condition and uplift in biodiversity over the 30 year period:
 - There will be negative impacts to these habitats from urban pressures, such as: additional footfall; pets (primarily dogs and cats) will impact wildlife and damage plants; road traffic may similarly impact wildlife; herbicide/insecticide use on or nearby may impact plants and insects.
 - In addition, due to the lack of a clear post-development habitat map indicating the locations of the proposed modified grassland, it is unclear what other pressures may negatively impact it over the 30 year period, e.g., lack of connectivity and fragmentation/edge effects would also likely reduce the plant, invertebrate, and wildlife populations supported in these areas. Thus, all things being equal these isolated and relatively small grassland habitats located in urban developments will generally support less biodiversity than an equivalent habitat located further away from urban impacts. Additionally, many of the impacts listed above cannot be effectively mitigated against through management and will be cumulative over time.
- The authority should consider securing the on-site habitat creation/enhancement for this development via a section 106 agreement to be in-line with national guidance. This would need to be agreed and signed pre-commencement to discharge the biodiversity gain condition, and this requirement reflects

the relative significance and distinctiveness of the habitat creation/enhancement proposed (4.6 Habitat units).

- As mentioned above, at least 2.24 units will need to be secured to reach 10% mandatory net gain for this site. Options for purchasing offsite habitats units can be seen below.
- These will need to be secured pre-commencement and can be achieved via 2 routes:
 1. Bespoke habitat creation/enhancement could be undertaken by the applicants on land they own elsewhere or in agreement with another landowner. To discharge the biodiversity gain condition the applicants would have to secure the appropriate habitat creation/enhancement by either entering a section 106 agreement with the local authority or through undertaking a conservation covenant with a responsible body pre-commencement.
 2. The applicants could purchase the appropriate number of units from an off-site habitat bank and evidence this to the authority pre-commencement. This can be achieved through the applicants contacting an off-site unit provider, aka a habitat bank, (which has biodiversity units registered on the national gain-site registry) to arrange a contract for the applicant to purchase the necessary units from the habitat bank. The habitat bank then notifies the national gain-site register to allocate the specifically referenced units to the applicant. To discharge the general biodiversity gain condition, the applicant provides us with this reference information and evidence of the purchase (e.g. a receipt or copy of the contract with the habitat bank) along with the biodiversity gain plan that they must submit to us pre-commencement. These details are also recorded within a finalized version of the metric submitted with the gain plan. The authority can then independently confirm the unit transfer by checking the unit references against the national gain-site register and then approve the gain plan to discharge the Biodiversity Gain condition.
- Finally we will require a full HMMP and biodiversity net gain plan due to the significant onsite habitat creation planned.

Conclusion: There has been insufficient BNG information provided to determine this application and we need further BNG assessments for the outline application. In contrast, we are confident that mandatory 10% net gain can be achieved for the initial phase of this development through securing the appropriate number of offsite units pre-commencement, however, the habitat target issues outlined above must be addressed before we can determine the number of off-site units required. These details should be finalized as soon as possible to minimize uncertainty and potential delays when the applicants seek to discharge the general gain condition. Lastly, we will require an HMMP and BNG gain plan to be submitted and approved pre commencement, and the authority should seek to secure the proposed onsite biodiversity provision and HMMP via a s106 agreement.

Please get in touch if you have any further questions,

Kind Regards,

Grace Hill

BNG Ecologist

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