

K4 Keppel
Daedalus Park
Daedalus Drive
Lee on the Solent
PO13 9FX

13th March 2026

Dear Grace Hill (BNG Ecologist at South & East Lincolnshire Councils Partnership)

RE : Response to Ecology Comments Received 10th February by email

This ecology note has been produced to respond directly to the ecology comments received on 10th February 2026, provided on the hybrid application (reference H09-0442-25) 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). The comments provided by Grace Hill (BNG Ecologist for South & East Lincolnshire Councils Partnership) can be seen appended to this note.

Specifically, the comments state that the proposed wetland Other Neutral Grassland should be classified as either other neutral grassland in poor condition or as a SuDS in moderate condition due to concerns on the enriched nutrient status of the arable land and effects of cyclical inundation.

The client and landscape team have informed that the SuDS to be created is expected to be managed as a damp grassland. It has been designed for water to infiltrate, and it is not expected that it will generally be flooded except during heavy rain events. Therefore, it is considered suitable that it will be managed as a wet meadow grassland.

Further, I do believe that moderate condition is achievable for this grassland. On the existing active arable field, there is currently good condition other neutral grassland (ONG) with high diversity within only a few metres of the field that would likely be subject to some additional nutrient load from fertiliser on the field. This shows that even with some likely existing nutrient loading, high diversity can exist. The proposed ONG will be adjacent to this good condition parcel and therefore considered local conditions can clearly support higher diversity grassland.

As per the previous comments received, we have adjusted the Habitat Management and Monitoring Plan (HMMP) to include a 2-year recovery period for the grassland with remedial measures recommended if needed in Year 3 to add a

supplementary wildflower mix for wetlands onto the area. Since good condition ONG already exists in close proximity to the site, with a recovery period to flush out the nutrients with regular management and remedial measures, it is expected that the conditions for achieving moderate condition ONG are likely and the HMMP requires regular condition monitoring and management to ensure it will meet this condition.

There are also plenty of case studies where species-rich grassland is created on arable fields, including in wet meadow. One such case study is Broad Meadow, Northamptonshire (case study appended), which was also subject to seasonal flooding. An arable field with high nutrient levels was converted to a wet meadow with Emorsgate EM8 sown (the same meadow mix proposed on this scheme). Initially, the meadow was cut four times in six months, which would have helped reduce nutrient levels. After this it was managed with annual hay cut and grazing. In monitoring over multiple years, the meadow was found to have a mean species richness of over 15 species per m², which meets the species diversity for a high distinctiveness meadow.

On this site, we are proposing an even longer recovery nutrient period than the above (2 years compared to 6 months), similar management measures through hay cuts and in an area that will also be subject to occasional flooding. However, we are only targeting moderate condition ONG, a much lower distinctiveness and condition than achieved at Broad Meadow, as moderate condition only requires 8 species per m². Management will ensure the other condition criteria are met.

Therefore, based on existing examples (including the above case study) and local conditions to support this habitat, I believe the current proposals are realistic and acceptable and the BNG metric does not require further amendment.

Kind regards,

Darrelle Moffat BES (Hons) PGCert ACIEEM

Senior Project Ecologist

Appendix A. Screenshot of email with Grace Hil's comments on 10th February 2026

Hi Jen,

Please see our response below.

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)

Documents reviewed:

- BNG Statutory Metric
- Environmental impact assessment
- BNG Assessment

Comments

- First, we'd like to thank the agent and ecologist for engaging with our previous comments and amending a full baseline BNG assessment for the whole outline application. We do have some further comments regarding the BNG proposals for phase 1.
- If the Proposed wetland Other Neutral Grassland is designed to be a sustainable drainage system then it should either be categorised as a SUD in moderate condition in the metric or as poor condition ONG instead of moderate condition. We argue that it is not feasible to achieve moderate condition ONG here, given both the enriched nutrient status of the arable land, and the effects that cyclical inundation of the area will have on both the species diversity, damage, and management regime for this parcel.
 - If this habitat parcel was to be altered to other neutral grassland in poor condition, the overall unit deficit for phase one the site would be 3 units.
 - If this habitat parcel was to be altered to a SUD in moderate condition the overall unit deficit for phase one of the site would be 3.3 units.
- Lastly, to clarify the S106 requirements for this development: the s106 is needed to secure the on-site habitat units to be in line with national guidelines due to the "significance" of the proposed habitat provision. This is needed regardless of where the offsite habitat units are coming from.
- We are happy with the current updates in the Biodiversity Gain plan and the rest of the plan can be filled out at the condition discharge stage when the appropriate units have been secured for this site. These will also need to be included in a finalized metric at the condition discharge stage as well.

Please get in touch if you have any further questions,

Kind Regards,

Grace Hill

BNG Ecologist

South & East Lincolnshire Councils Partnership

Appendix B. Case Study of Broad Meadow, Northamptonshire conversion

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Case Study 10.8

Broad Meadow, Northamptonshire – converting an arable field to a floodplain meadow

About the site

Broad Meadow was species-rich floodplain meadow until the 1970s, when the farmer gave up dairying and converted to arable. The fields were used for arable production until 2007 when the last crop of oilseed rape was harvested. During this time artificial fertiliser was used as required. The field floods from the river each autumn and spring.



Broad Meadow in 2012. © RNRP



Technique used

Soil analysis undertaken in August 2007 showed that phosphorus levels were on the upper edge of the expected range for a species-rich floodplain meadow (phosphorus 16 mg/kg^{-1} , potassium 96 mg/kg^{-1} , magnesium 129 mg/kg^{-1} , pH 6.3). Emorsgate Meadow Seed Mixture for Wetlands (EM8) was chosen on the basis of the soil fertility and hydrological conditions, and included 17 wildflowers and seven grasses.

The seed was sown at 3 g/m^2 in April 2008 after the field had been ploughed and rotavated. A small section that had not been used for arable cropping was treated with the herbicide glyphosate. After sowing, the meadow was cut four times during the first six months. No grazing took place in the first year.

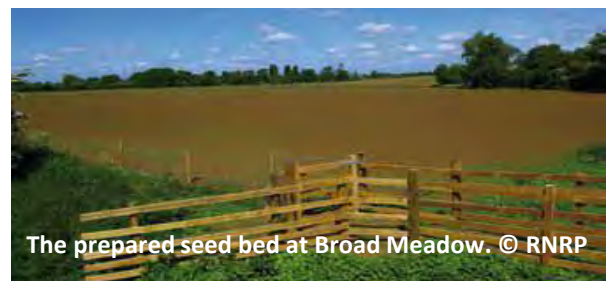
In 2009 a hay cut was taken. The cut was timed to remove the maximum amount of nutrients, and took place on 30 June. It was baled on 2 July, making 242 large bales from approximately 7 ha.

Ongoing management

The meadow is cut for hay annually during June or July and is then grazed by sheep and/or cows until late autumn. The farmer cuts and bales the hay and then sells it. A grazier provides livestock for aftermath grazing.

Monitoring

- A botanical survey using ten $1 \times 1 \text{ m}$ quadrats, 15 m apart is carried out in June each year by surveyors from the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire and the River Nene Regional Park. The abundance of all plant species is recorded.
- A butterfly transect is undertaken by the farmer's wife once a week from April to September (as per UKBMS43 criteria).



The prepared seed bed at Broad Meadow. © RNRP

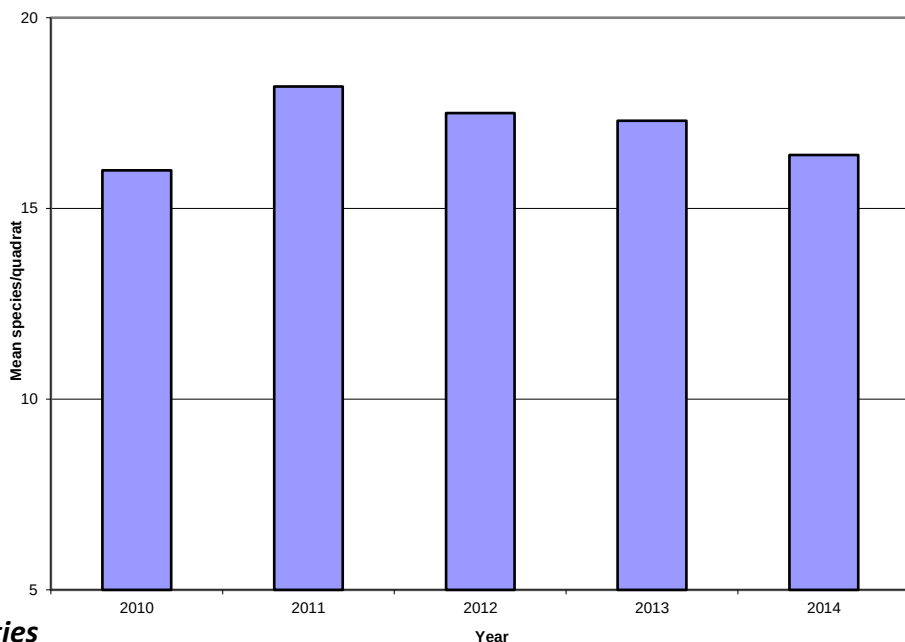


Results

Species-richness

At Broad Meadow there has been little change in mean species richness between years since the start of the trial (see Figure 10.9). However, this does not mean that there have not been substantial changes in the composition of the vegetation, as the balance of species has changed.

Figure 10.9 Species-richness (the mean value based on ten quadrats) over time at Broad Meadow, Northamptonshire.



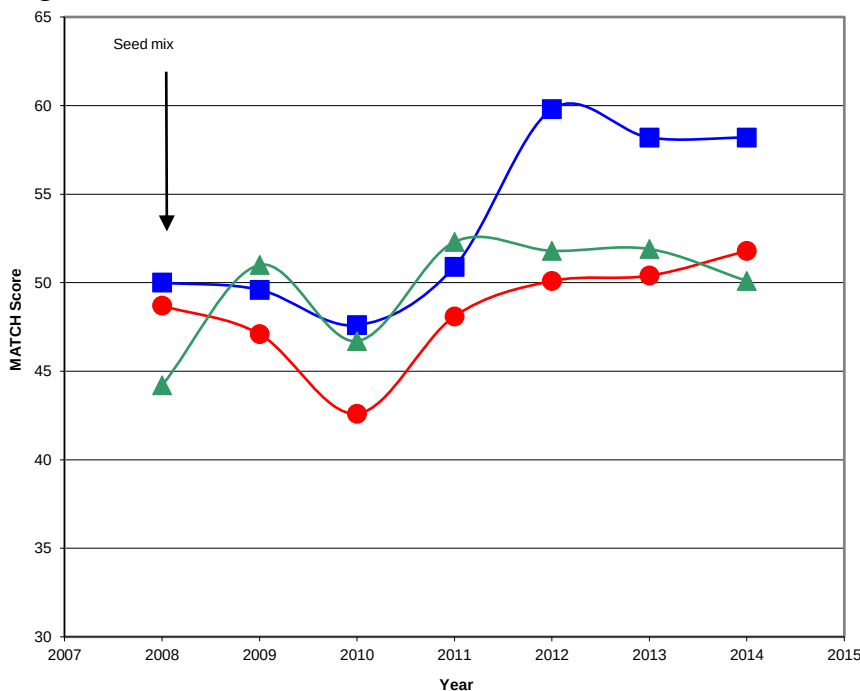
Goodness-of-fit to NVC communities

The degree of similarity with NVC communities was calculated using the MATCH programme for:

- the species list of the seed mix (2008 values);
- a species list for 2009 (no constancy values were available for that year);
- constancy tables based on ten quadrats recorded each year between 2010 and 2014.

The progression of the sward towards Burnet floodplain meadow (MG4) community can be seen in Figure 10.10. The MATCH score is approaching 60, which is generally considered as representing an acceptable level of agreement.

Figure 10.10 MATCH Scores for the seed mix applied in 2008, a list of species recorded in 2009 and constancy values for species recorded in ten quadrats annually between 2010 and 2014 at Broad Meadow, Northamptonshire.





The restoration has been so successful that the site has now been designated as a Local Wildlife Site and several site visits have been conducted with other interested farmers, which have led to another 100 ha of species-rich meadow restoration being undertaken.

Costs

Covered by Natural England's Higher Level Scheme and the landowner.

- Seed: £16,000.
- Fencing and new hedges: over £15,000.
- Ongoing management and creation of new permissive path: approximately £4,500 per year for ten years.

Partners

Natural England, River Nene Regional Park CIC and Mr and Mrs Banner (landowners).

Benefits

- Reduced nutrient inputs to River Nene from cessation of artificial fertilisers.
- Increased offtake of nutrients from Nene catchment through removal of hay crop.
- Economic benefit through sale of hay and grazing.
- A new permissive path increases public access.
- Creation of 7 ha of flower-rich pollinator habitat.
- Creation of a demonstration and discussion site.

