

Burrell, Becky

From: Beth Fox <bfox@lincstrust.co.uk>
Sent: 26 June 2023 13:48
To: _planningadvice
Subject: H09-0501-23 Lincolnshire Wildlife Trust response
Attachments: LWT response.pdf

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Good afternoon,

Please find attached the response to the planning H09-0501-23 (Erection of Agricultural Machinery Assembly Facility, Research and Training Facility, Ground Mounted Solar Array and Associated Infrastructure) from the Lincolnshire Wildlife Trust.

Kind regards,

Beth Fox (she/her)
Conservation Officer
Lincolnshire Wildlife Trust

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26 June 2023

Dan Allen
Case Officer
Priory Rd
Spalding
PE11 2XE

Dear Dan Allen,

H09-0501-23: Erection of Agricultural Machinery Assembly Facility, Research and Training Facility, Ground Mounted Solar Array and Associated Infrastructure at Land off Holbeach Drove Gate Holbeach Drove

Lincolnshire Wildlife Trust wishes to place a **holding objection** until updated ecological documentation has been submitted based on field surveys undertaken at an appropriate time of the year, using the correct site boundaries and including the solar array element of the development proposal.

The Preliminary Ecological Appraisal (PEA) submitted is based on a field survey undertaken on 13/02/2023. This is an inappropriate time of year to conduct this survey. The JNCC guidance states that *'the field season should be considered as starting late March/early April in the south and April/early May in the north of England. The season generally ends about mid-October, although in a mild season it may be possible to carry out some survey in November'*. We therefore must insist that the field survey is re-done in line with JNCC guidance so that the conclusions drawn regarding the habitats and species present on site are based on accurate information.

The Trust ask that the updated field survey that needs to be completed in relation to this development is a UK Habitat Classification (UKHAB) survey, rather than a Phase 1 Habitat Survey. UKHAB is the new expected industry standard for such surveys as it provides more detail and is less open to interpretation than the JNCC's Phase 1 Habitat Survey. The UKHAB survey must be conducted by an ecologist with practical experience of UKHAB surveys and should reach FISC Level 4 as best practice. UKHAB is also the required survey method for Biodiversity Net Gain matrices. Both of these requirements are stated in:

- CIEEM-CIRIA-IEMA Good Practice Principles for BNG
- BNG British Standard BS8683:2021
- CIEEM BNG Report Templates

The PEA is based on a different area than the site location referenced in multiple other documents. In section 2.1 of the design and access statement 'the application site is essentially a 10.5ha field', yet in the application form the site area is noted as 4.97ha. We find this discrepancy concerning and wish for clarification. Figure 2 in the

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PEA shows the site outline in red, this does not match up with the separate site location plans provided. The area outlined in the PEA is significantly smaller than outlines provided in other documents. We require that the updated PEA include the entire site boundary.

Another concern we have with the PEA is that in the project description there is no mention of the ground mounted solar array and associated infrastructure, with the introduction stating 'the survey is required in connection with plans for the development of an agricultural machinery manufacturing, research and training centre on the site'. Furthermore, there is no reference to the solar array in the rest of the report. This is highly unusual and we require that this information is included in an ecological report before we would consider lifting out holding objection.

Section 2.2 of the design and access statement reads that 'other for some scrub and an area of semi-mature trees...there are no other features of interest'. This is not the case, the PEA clearly states the presence of important hedgerow, both wet and dry ditches and a pond within the 4.97ha site. The negative impacts the development would have on these features need to be mitigated for. We support the recommendation in the PEA that hedgerows should not be removed and would like to see this conditional to the approval of this application. If the Local Planning Authority does not see this as appropriate we ask that any hedgerow removal only take place between September and October in order to avoid both reptile hibernation and bird nesting seasons. The wet and dry ditches on site also require protection from negative impacts, we suggest generous no-work buffer zones around these areas. We support the recommendation made in the PEA that an eDNA survey should be conducted on the onsite pond to check for Great Crested Newt presence and recommend that additional mitigation measures, such as a buffer zone, is enforced around the pond.

While the Environment Act mandated Biodiversity Net Gain (BNG) to a minimum of 10% policy does not become mandatory for TCPA applications until November 2023, it is expected that developments within this transition period should address the requirement, as well as providing the associated management and monitoring plan for a 30-year period. The uploaded documents on the planning portal do not contain any form of management plan for this development. Lincolnshire Wildlife Trust would like to see both a BNG calculation predicting gains on site as well as a management plan before we would consider lifting our holding objection on this site.

If you have any queries regarding the above, please do not hesitate to contact me.

Yours sincerely

Beth Fox
Conservation Officer

