Gavin Baxter

From: Jon Byrd <jon.byrd@alliedecology.co.uk>
Sent: 21 October 2022 10:10
To: Gavin Baxter
Cc: Adam Jagger
Subject: RE: 8008 - Holbeach Meadows Affordable Village - Lincs Wildlife Trust Comments

Hi Gavin,

Thank you for sending this across.

The submitted Biodiversity Net Gain Assessment largely addresses the Wildlife Trust's comments. Where the proposals and submitted information differ slightly from the comments are as follows:

1. Demonstrating 10% Biodiversity Net Gain
2. 30 Year Management Plan

On point 1, the Wildlife Trust is entirely correct in stating that there is no mandatory requirement to demonstrate 10% net gain. The proposals are able to clearly demonstrate that positive biodiversity net gains can be achieved, and remain entirely compliant with Local and National Policy / current legislation in this regard. Positive measurable Biodiversity Net Gains are able to be achieved for habitat areas, hedgerows, and ditches, as set out within the Biodiversity Net Gain Assessment, which exceed minimum policy requirements.

On point 2, there is no policy requirement to provide or have approved a 30 year management plan prior to determination of the planning application. This type of documents is often wrapped up by local authorities as part of a wider Landscape and Ecological Management Plan (LEMP) condition, or similar document, and can take all ecological features / enhancements (including faunal species which are not included / are separate from the DEFRA 3.1 metric calculations) within the site into account – this can be readily and is routinely conditioned by local authorities and is not a pre-determination requirement. In addition, throughout the consultation process, it remains possible that minor tweaks to the layout may be required in order to address queries from other consultees and as such, agreeing the scope and content of the Landscape and Ecological Management Plan (LEMP) prior to commencement / post-planning, once the scheme is entirely fixed, remains appropriate and proportionate to the scale of the project.

Many thanks,
Jon

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