

Burrell, Becky

From: De-Ruyck, Chris <Chris.De-Ruyck@e-lindsey.gov.uk>
Sent: 06 February 2025 16:54
To: Niland, Mark
Cc: _planningadvice
Subject: RE: Glendum Close : H19-0049-24

Hello Marc,

I have reviewed the updated metric and BNG assessment report appended to the above application and think there is now an important issue that needs addressing regarding the transparency and rigour of the baseline biodiversity area-habitat calculations. Herein, the original report and metric calculations estimated that the applicants would need to purchase 3.55 area-habitat units from an off-site provider to achieve 10% BNG, while the appended report and metric have reduced this estimate to 1.78 units required. However, there is currently an unacceptable lack of transparency and rigour to justify this change.

The problem revolves around the baseline habitat condition assessment of the grassland occupying the north half of the site. This area has been degraded from its original state as explained in the report, and therefore the baseline biodiversity value must be based on whatever pre-existing data sources may be available (e.g., google earth imagery and habitat condition of remnants of original habitat), as well as professional judgement. The original report took a precautionary approach as recommended on pages 15, 80, and 148 of CIEEM's "Good Practice Principles" (<https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practical-guide-web.pdf>), and classified this grassland parcel as "other neutral grassland" in "moderate" condition. This is an acceptable/justifiable approach to take as there would be little reason to believe that the ecological condition of this area would be "good" in the absence of grazing or management of some kind. In addition, the species composition recorded in the remnant patches and described in the report, as well as the google streetview images (with herbaceous species apparent) lend some support to the "moderate" condition classification. However, the appended report lists this habitat in "poor" condition, which significantly reduces the baseline biodiversity value of the site, yet, provides no evidence to justify this change. Therefore, there is no information for the authority (or interested members of the public or potential future Inspectors) to review to assess the reliability of this amended conclusion. In all other respects the two sets of BNG assessments are equivalent.

I would argue that we would need to see quadrat or transect data from vegetation surveys of the remaining grassland to justify this downgrading of the grasslands condition from moderate to poor. Photos of the remaining grassland could also be useful for providing suitable justification for abandoning the original precautionary approach taken. In the absence of this evidence, I believe the authority should expect the applicants to secure the equivalent of 3.55 units off-site from a habitat bank to meet the 10% biodiversity net gain requirement and discharge the general gain condition pre-commencement.

Thank you very much for your time,
Chris

Chris De Ruyck

Senior Ecologist

South & East Lincolnshire Councils Partnership

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From: Niland, Mark <Mark.Niland@sholland.gov.uk>

Sent: 03 February 2025 09:33

To: De-Ruyck, Chris <Chris.De-Ruyck@e-lindsey.gov.uk>

Cc: _planningadvice (SHDC) <planningadvice@sholland.gov.uk>

Subject: Glendum Close

Morning Chris,

H14-0049-24 - GLEN FARROW LIMITED

I hope you are keeping well?

Please find attached the last set of BNG updates for the above site.

Kind Regards

Mark

Mark Niland | Planning Officer | South Holland District Council

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www.sholland.gov.uk



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