

Sent by email only to: planningadvice@sholland.gov.uk

13th February 2024

Dear Mr Niland,

H14-0049-24 – Glen Farrow Limited, Glendum Close: Extension to existing unit for manufacturing facilities and new storage outbuilding including material changes to external facade of existing unit and internal changes

Lincolnshire Wildlife Trust wishes to register a **holding objection** on this application until ecological information has been submitted; and Biodiversity Net Gain as a result of the development is incorporated into the design of the project, with the associated 30-year monitoring and management plan.

This site is within the 2km buffer zone of a Local Nature Reserve (LNR), nine Local Wildlife Sites (LWS), and nine priority habitats. Yet, no information regarding Biodiversity Net Gain, or ongoing management and monitoring of the site has been submitted. In England, BNG is mandatory under *Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)*. Developers must deliver a BNG of 10%. While this application was submitted just prior to the BNG legislation start date, it is expected that developments within the transition period should address the requirement given that it was in November 2021 that the Environment Bill mandating BNG gained Royal Assent to become an Act. Each planning application should demonstrate how the natural environment has been assessed to ensure delivery of biodiversity net gain and contribution to a nature recovery network has been included.

We suggest that a UK Habitats Assessment is undertaken as UK Habs must be used in the calculation of BNG as stated in:

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

Without this baseline calculation it is not possible to use the metric to prove a 10% BNG will be achieved. The assessment must be conducted by an ecologist with practical experience of UK Habs surveys and should reach FISC Level 4 as best practice. Net gains for biodiversity should contribute to the wider ecological network and the wider environmental landscape. Developers and Planning Authorities should be aware of local biodiversity strategies such as biodiversity opportunity mapping, local nature recovery strategies and biodiversity action plans. The initial landscape design should increase connectivity joining up new and existing areas of green space around and within the development to ensure that they do not become isolated by the built environment and allow movement of wildlife around the site and into the wider countryside.

Page 20 of the Design and Access Statement states:

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*“Should planning be granted, then a detailed landscaping plan **can** be produced to enhance the sites biodiversity with native planting to attract birds, insects and invertebrates.”*

As a Trust, we feel that planning approval should be conditional on securing a minimum 10% BNG, and that the detailed landscaping plan that *can* be provided, *will* be provided. Our holding objection reflects the lack of ecological consideration and not the development itself.

We are in a climate and biodiversity crisis, and we all need to play our part in addressing that, as recognised by the UK Government in their 25-Year Environment Plan, where it is stated that protection is not enough anymore - we need to recover nature and the natural environment so it functions to deliver all the ecosystem services we require.

The Lincolnshire Wildlife Trust hopes these comments are helpful at this stage and welcomes further discussion relating to the points covered.

In conclusion: Lincolnshire Wildlife Trust would like to register a holding objection on this application pending the inclusion of Biodiversity Net Gain, and the associated plans and surveys.

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

Yours sincerely

Hannah Curtis

Conservation Officer

