



**Proposed Industrial Unit Extension, Benner Road
Industrial Estate, Pinchbeck, Spalding PE11 3DQ**

Biodiversity Net Gain Report

Document Control

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Contents

1. Introduction	4
Background	4
Relevant Documents	4
Site Description	4
Development Proposals	4
Planning status of project, certainty of design and assumptions made	4
Aims, Objectives & Scope	4
Planning Policy and Legislation	5
2. Methodology	6
Personnel	6
Field Survey	6
UKHab & Condition Assessment Survey	6
Biodiversity Net Gain Metric Calculation	6
Classification and Measurement of Habitats	7
Limitations	8
3. Results	10
Baseline Habitats	10
Proposed Design	13
Biodiversity Metric Results	14
4. Conclusion	15
5. References	16
6. Figures	17
Appendix 1: Planning Policy & Legislation Summary	18
National Planning Policy Framework 2023	18
The Environment Act 2021	18

Tables

Table 1: Summary	3
Table 2: Site Habitat Baseline Areas	11
Table 3: Site Hedge Baseline	12
Table 4: On-site Habitat Creation	13
Table 5: Site Hedge Creation	13
Table 5: Summary of Biodiversity Metric Output	14

Table 1: Summary

Report Purpose	The objective of the present Biodiversity Net Gain (BNG) report is to provide an assessment as to whether the proposed development can deliver BNG or not for the design option(s) being considered.
Methodology	- Modified grassland and urban habitats were assessed in June 2024. - The area of grassland to the north was assessed on-site in June 2024 and the baseline habitat date adjusted based on historical satellite imagery of the site to account for degradation of the grassland vegetation. Reasonable assumptions have been made regarding the habitat types and condition assessments in the absence of detailed data. - A biodiversity metric calculation was made, using the prevailing biodiversity metric calculation spreadsheet at the time of writing (DEFRA Statutory Metric).
Results & Conclusions	Following best practice guidelines for use of the Statutory Biodiversity Metric assessment has shown a total net lost post-development of -1.6 habitat units (-89.41%), and a biodiversity net gain of +0.06 hedgerow units (+75.22%). This equates to a deficit of 1.78 habitat units and below the biodiversity net gain target of 10%. Trading rules were not satisfied. It is considered that the on-site delivery of required habitat units to reach a 10% biodiversity net gain would not be feasible under the current development proposals. It is therefore recommended that off-site habitat compensation options are explored, such as via the purchasing of biodiversity units from a third-party habitat bank or via a financial contribution to be negotiated with the Local Planning Authority.

1. Introduction

Background

- 1.1. Elton Ecology Ltd was commissioned by Glen Farrow Ltd to conduct a Biodiversity Net Gain (BNG) Study of the site known as Proposed Industrial Unit Extension, Benner Road Industrial Estate, Pinchbeck, Spalding PE11 3DQ.

Relevant Documents

- 1.2. The present assessment has been informed by the following documents:
- Proposed Site Location and Site Plan (DWG No. 23/04 – 09C) (Hayward Architects Ltd, Feb 2023)
 - Proposed Surfaces Layout (DWG No. 23/04 – 15B) (Hayward Architects Ltd, July 2023 [received via email 19/11/2024])

Site Description

- 1.3. The site is located in Benner Road Industrial Estate, Pinchbeck, Spalding PE11 3DQ (Figure 1: Site Location Plan) (central OS grid reference: TF 25830 25340). The site comprises an existing warehouse unit with areas of hard standing fronted by mown grassland, an ornamental pond, four silver birch trees and ornamental hedgerows to the south. To the north is an extensive area of closely mown grassland with scattered tall forbs and bare ground, separated from the hard standing by a strip of gravel.

Development Proposals

- 1.4. The development proposals include the construction of an extension of the existing industrial building and creation of a manufacturing facility with associated parking, outside storage building, service yard and hard and soft landscaping.

Planning status of project, certainty of design and assumptions made

- 1.5. The present strategy has been prepared to inform a planning application based on the proposed site plans detailing the extents of curtilage and created habitats on site.

Aims, Objectives & Scope

- 1.6. With reference to the Development Proposals and best practice BNG reporting guidelines (CIEEM, 2021), the objectives & scope of the present strategy are to provide:
- An assessment as to whether the project can feasibly deliver BNG or not for the options being considered;
 - Advice for the project to maximise its ability to deliver BNG considering factors such as location, design, construction methods and programme (where known/relevant);
 - If on-site BNG cannot be achieved, consideration of the potential for off-site delivery of BNG, either securing land in close proximity to the project site or other alternatives, including more distant land under direct control or a brokered agreement; and
 - Where, following a review of the BNG Principles, the delivery of project-wide BNG as an outcome is not considered possible (e.g., as a result of impacts to

irreplaceable habitats or other site constraints), a record of the reasons and next steps towards delivering biodiversity gains elsewhere through the project.

Planning Policy and Legislation

- 1.7. A summary of biodiversity planning policies and wildlife legislation relevant to the site is provided in Appendix 1.
- 1.8. The site is covered by the Lincolnshire Biodiversity Action Plan (BAP), which includes:
 - Hedgerows and hedgerow trees
 - Trees and woodland
 - Urban including brownfield, gardens (including ponds)
 - Bats (all species)
 - Commercial fish (marine)
 - Farmland birds
 - Freshwater fish
 - Greater water-parsnip *Sium latifolium*
 - Natterjack toad *Epidalea calamita*
 - Newts including smooth newt *Lissotriton vulgaris*, palmate newt *Lissotriton helveticus* and Great crested newt *Triturus cristatus*
 - Seals
 - Urban birds – swift *Apus apus*, song thrush *Turdus philomelos* and house sparrow *Passer domesticus*
 - Water vole *Arvicola amphibius*
 - White-clawed crayfish *Austropotamobius pallipes*
 - Invasive non-native species

2. Methodology

Personnel

- 2.1. The UKHab Survey and Condition Assessment was carried out by Ecologist CM BSc (Hons), MSc. CM is trained and experienced in undertaking UKHab survey, Biodiversity Net Gain, and in botanical species identification.

Field Survey

UKHab & Condition Assessment Survey

- 2.2. A UKHab and condition assessment survey was carried out of the site on 4th June 2024 with reference to best practice guidelines from UKHab Ltd (Butcher *et al.*, 2023). The site was walked over, and the habitats present classified based on key indicator species present.
- 2.3. A hedgerow was defined as any boundary line of trees or shrubs over 20m long and less than 5m wide, and where any gaps between the trees or shrub species are less than 20m long. Any bank, wall, ditch, or tree within 2m of the centre of the hedgerow is considered to be part of this habitat, as is the herbaceous vegetation within 2m of the centre.
- 2.4. The condition assessment was carried out with reference to guidance within the Biodiversity Metric Condition Sheets and Technical Supplement (Natural England, 2024). The condition of each habitat was assessed by scoring each habitat parcel against the criteria set out in the Biodiversity Metric Habitat Condition Assessment Sheets. A condition score was assigned to each habitat parcel based on a range of positive and negative indicators of quality against the optimum ecological state for the habitat, such as a grassland having species richness (positive) or the presence of invasive non-native plants (negative). This is used as an indicator for whether the habitat is a good or poor example of its habitat type/ distinctiveness, and to inform future management for ecological enhancement where applicable.

Biodiversity Net Gain Metric Calculation

- 2.5. The prevailing biodiversity metric calculation spreadsheet at the time of writing was used, the Statutory Biodiversity Metric, with reference to the Technical Supplement and User Guide (Natural England, 2024).
- 2.6. The statutory biodiversity metric calculates the biodiversity units present as follows:

Baseline Habitats:

Size of Habitat Parcel x Distinctiveness x Condition x Strategic Significance = Baseline Biodiversity Units

Post-intervention Habitats are calculated as above, and then:

x Difficulty x Time to Target Condition x Spatial Risk = Post-intervention Biodiversity Units

The net gain or loss in Biodiversity Units is then calculated as:

Post-intervention units – Baseline units = (+/-) Net Change

- 2.7. As the basis of the calculations, the Statutory Biodiversity Metric requires the user to enter a series of variables for each baseline, enhanced or created habitat parcel. These variables and decisions made are summarised in the sections below and presented in the results section. No river habitats were present at the site, and as such variables relating only to river habitats have not been included.

Classification and Measurement of Habitats

- 2.8. The UK Habitat Classification System (UKHAB) (Butcher *et al.*, 2023) was used during field surveys and converted to the appropriate habitat classification via the Statutory Metric guidance (Natural England, 2024), to complete the broad habitat and habitat type variables of the Statutory Metric calculator.
- 2.9. The habitat areas were mapped via the QGIS 3.34.8 "Prizren" geographic information system application using a geo-referenced and ground-checked satellite image of the site.
- 2.10. Post-development habitat areas were measured from the illustrative Proposed Site Plans, georeferenced into QGIS.
- 2.11. Following the Statutory Biodiversity Metric QGIS Template and Import Tool User Guide (Natural England Joint Publication JP039), each habitat parcel was entered into the QGIS Template where the data was exported into the Import Tool to consolidate the data to be entered into the Statutory Metric calculator.

Strategic Significance

- 2.12. This is a score based on whether the location of the habitat is significant for nature. An assessment of this variable requires consideration as to whether the site is located within the relevant biodiversity local strategy, plan or policy, designated sites for nature conservation, and the sites position within the landscape. If published, the relevant document is the Local Nature Recovery Strategy (LNRS).
- 2.13. With reference to the Department of Environment, Food & Rural Affairs (DEFRA) Policy paper 'Local Nature Recovery Strategies', there are 48 local nature recovery strategy areas covering England¹. The relevant strategy area for the site is Greater Lincolnshire and the relevant responsible body is Lincolnshire County Council ². The LNRS for this area was not yet available at the time of the present assessment.
- 2.14. If no LNRS is available for the local authority area applicable to the site, other relevant documents and criteria are used which can include local published plans, strategies or policies, as listed within Statutory Biodiversity Metric and any other relevant documents. If the geographic location or type of habitat present is listed within the other relevant documents, a score of high is assigned to the given habitat area. These include:
 - Statutory Designated Sites
 - Non-Statutory Designated Sites
 - National BAP Priority Habitats
 - Local Plan
 - Neighbourhood Plan
 - Area of Outstanding Natural Beauty/National Landscapes Management Plan
 - Local Biodiversity Action Plan

¹ <https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies> <Accessed 04.07.2024>

² <https://www.glincolnrs.org.uk/> <Accessed 04.07.2024>

- Species and protected sites conservation strategies
- Green Infrastructure / Tree / Woodland Strategies
- River Basin Management Plans
- Catchment Plans and Catchment Planning Systems
- Habitats Supporting Populations of Notable/ Priority and/or Protected Species
- Biodiversity Opportunity Map (BOM)

2.15. Where there are no relevant documents, professional judgement was used to assign a strategic significance score of either 'medium' or 'low'. If a habitat location or type is not listed within a relevant document and there is a lack of evidence to support a professional judgement of 'medium' strategic significance, a score of 'low' is assigned.

2.16. The relevant planning policy documents are:

- South East Lincolnshire Local Plan

2.17. The site is not included within the planning policies as a nature conservation priority.

2.18. The relevant Local Biodiversity Action Plan for the site is the Lincolnshire Biodiversity Action Plan.

Bespoke Compensation Agreed for Unacceptable Losses

2.19. This is a yes/no decision cell to indicate whether bespoke compensation has been agreed with decision makers for any losses in very high distinctiveness habitats.

Temporal Multiplier

2.20. Within the temporal multiplier for each created/ enhanced habitat parcel the metric requires the user to enter the following variables:

- Habitat created in advance/ years: The statutory metric rewards habitat creation in advance of losses by reducing the temporal risk multipliers added.
- Delay in starting habitat creation/ years. If there will be a significant delay in the creation of a habitat type relative to any losses (e.g. phased development), the number of full years that the creation will be delayed is entered. The statutory metric then adds the number of years to the pre-populated time to target condition, which increases the effect of the risk multiplier.

Limitations

2.21. The accuracy of habitat area measurement is limited by the methods by which the baseline data was collected and resolution of development proposal plans. In this instance, baseline habitat areas have been calculated by cross referencing illustrative habitat plans mapped in the field with georeferenced aerial imagery. Post-development habitat areas were measured from the concept landscape plans, georeferenced into QGIS.

2.22. Reasonable assumptions have been made with regards to the type/condition of habitats that could be created, which would need to be informed by a detailed Landscape Ecological Management Plan. Concept landscape plans are not detailed; likely feasible habitats include modified grassland, introduced scrub and small native trees.

- 2.23. The Statutory Biodiversity Metric uses habitats as a proxy for biodiversity, which is a simplification of the real world. Although informed by evidence and reasoning, the outputs of the Metric are not scientifically precise or absolute values. The generated biodiversity unit scores are a proxy for the relative biodiversity worth of a habitat or site. The metric and its outputs must be interpreted with ecological expertise and a common-sense approach. The metric is an aid to biodiversity decisions.
- 2.24. All dimensions and distances provided are approximate.
- 2.25. The present study has been informed by the Proposed Site Plan, and the Proposed Surfaces Layout, and as such assumptions have been made regarding the final planned design including the precise extent of proposed landscaping and property boundaries.
- 2.26. The grassland to the north of the site had been recently heavily mown and human activities had created approximately 40% bare ground. With reference to Section 14 of the Environment Act 2021, where habitats have been degraded on site since 30th January 2020, *'the pre-development biodiversity value of the onsite habitat is to be taken to be its biodiversity value immediately before the carrying on of the activities'*. Available historic aerial and streetview images from Google Earth Pro and Bing have therefore been used to assess the habitats onsite prior to degradation, in conjunction with survey data collected in June 2024. In accordance with the Statutory BNG User Guide (Defra, 2024) a precautionary approach has also been undertaken based on reasonable assumptions in the absence of detailed data.

3. Results

Baseline Habitats

- 3.1. The baseline habitat areas at the site including the data entered into the biodiversity metric are given in Table 2 below and mapped on Figure 2.1: Baseline Habitat Plan, Figure 2.2: Baseline Habitat Retention. The hedgerow habitat lengths are provided in Table 3 and mapped on Figure 2.1.
- 3.2. Site degradation is partial, with recent management of grassland to the north resulting in approximately 40% bare ground. It is unclear from aerial photography whether the area was previously cleared (Google Earth Sept 2021) or whether the 2021 image shows mown grassland in a dry spell. The baseline habitat date for the grassland area to the north was taken to be 18th September 2020, with satellite imagery showing the site's full habitats prior to any degradation. With reference to Section 14 of the Environment Act 2021, where habitats have been degraded on site since 30th January 2020, '*the pre-development biodiversity value of the onsite habitat is to be taken to be its biodiversity value immediately before the carrying on of the activities*'. The baseline date for other habitats on site is taken as 4th June 2024.
- 3.3. Review of historic aerial photography/streetview shows that this grassland parcel was homogeneous, and sufficient habitat remains to make an informed judgement on the likely grassland type and condition. Species present are a mixture of persisting grassland species and ephemerals/ruderals growing amongst stored equipment or along margins. Grass species present at the time of the survey included annual meadow grass *Poa annua*, cocksfoot *Dactylis glomerata*, Yorkshire fog *Holcus lanatus*, false oat-grass *Arrhenatherum elatius*. Forbs included ribwort plantain *Plantago lanceolata*, common mouse-ear *Cerastium fontanum*, white clover *Trifolium repens*, spear thistle *Cirsium vulgare*, mugwort *Artemisia vulgaris*, teasel *Dipsacus fullonum*, cut-leaf cranesbill *Geranium dissectum*, cow parsley *Anthriscus sylvestris*, hogweed *Heracleum sphondylium*, common nettle *Urtica dioica*, common vetch *Vicia sativa*, black medic *Medicago lupulina*, brassica species and others. It is likely that the grassland was an other neutral grassland with tall forb species prior to degradation.
- 3.4. A professional judgement approach to habitat condition has been undertaken, with habitat assumed as poor condition at baseline on the basis of surrounding retained grassland. Photographs of the historic onsite habitats are available on Google Streetview.
- 3.5. River habitats were not present on site.

Table 2: Site Habitat Baseline Areas

UKHab Habitat Code	UKHab Habitat Classification	Data Entered into Metric				
		Unique Polygon Reference No.	Area (hectares)	Condition	Strategic Significance	Habitat retained/enhanced/lost
g4	Modified grassland	1	0.0362	Poor	Area/compensation not in local strategy/ no local strategy	0.032 retained
g3c	Other neutral grassland	2	0.4023	Poor	Area/compensation not in local strategy/ no local strategy	Lost
r1g	Ornamental lake or pond	3	0.0067	Poor	Area/compensation not in local strategy/ no local strategy	Retained
u1b	Developed land; sealed surface (includes building, hard standing)	4	0.3087	N/A	Area/compensation not in local strategy/ no local strategy	0.3004 retained
u1c	Artificial unvegetated, unsealed surface (gravel)	5	0.0742	N/A	Area/compensation not in local strategy/ no local strategy	Lost
u1 847	Built-up areas and gardens – introduced shrub	6	0.0137	N/A	Area/compensation not in local strategy/ no local strategy	Lost
	Individual Trees – Urban Tree		0.0163 (x4 small trees in poor condition)	Poor	Area/compensation not in local strategy/ no local strategy	Lost

Table 3: Site Hedge Baseline

UkHab Code	Hedgerow Type	Data Entered into Metric				
		Hedgerow number	Length (km)	Condition	Strategic Significance	Hedgerow retained/enhanced/lost
h2b	Non-native and ornamental hedgerow	1	0.04	Poor	Area/compensation not in local strategy/ no local strategy	Lost
h2b	Non-native and ornamental hedgerow	2	0.036	Poor	Area/compensation not in local strategy/ no local strategy	Lost

Proposed Design

- 3.6. The development proposals include the construction of an extension of the existing industrial building and creation of a manufacturing facility with associated parking, outside storage building, service yard and hard and soft landscaping.
- 3.7. The proposed habitats at the site including the data entered into the biodiversity metric are given in Table 4 below and mapped on Figure 3.1: Proposed Habitats Plan and Figure 3.2: Proposed Habitat Condition.
- 3.8. Concept landscape plans are not detailed; likely feasible habitats include modified grassland, introduced scrub and small native trees.

Table 4: On-site Habitat Creation

Data Entered into Metric						
Broad Habitat	Proposed Habitat	Area (hectares)	Condition	Strategic Significance	Habitat created in advance/years	Delay in starting habitat creation/years
Grassland	Modified grassland (new landscaping)	0.0069	Poor	Area/compensation not in local strategy/ no local strategy	0	0
Urban	Developed land; sealed surface (new buildings and hard standing)	0.4732	N/A - Other	Area/compensation not in local strategy/ no local strategy	0	0
Urban	Introduced shrub (car park planting areas)	0.0226	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	0	0
Individual trees	Urban tree (5 small new trees)	0.0204	Poor	Area/compensation not in local strategy/ no local strategy	0	0

Table 5: Site Hedge Creation

Hedgerow Type	Data Entered into Metric				
	Hedgerow number	Length (km)	Condition	Strategic Significance	
Species Rich Native Hedgerow	3	0.03	Poor	Formally identified in local strategy	

Biodiversity Metric Results

- 3.9. The completed biodiversity metric excel spreadsheet has been issued with the present report and should be read in conjunction with it. The 'headline results' output of the Biodiversity Metric 3.1 calculation are presented in Table 5 below.

Table 6: Summary of Biodiversity Metric Output

	Habitat / Hedgerow	Unit
On-site Baseline Units	Habitat	1.79
	Hedgerow	0.08
On-Site Post-Intervention Units	Habitat	0.19
	Hedgerow	0.13
Total Net Unit Change	Habitat	-1.60
	Hedgerow	+0.06
On-site net % change	Habitat	-89.41%
	Hedgerow	+75.22%
Trading rules satisfied?		No

4. Conclusion

- 4.1. Following best practice guidelines for use of the Statutory Biodiversity Metric assessment has shown a total net lost post-development of -1.79 habitat units (-89.41%), and a biodiversity Net Gain of +0.06 hedgerow units (-100%). This equates to a deficit of 1.78 habitat units and below the biodiversity net gain target of 10%. Trading rules were not satisfied.
- 4.2. It is considered that the on-site delivery of required habitat units to reach a 10% biodiversity net gain would not be feasible under the current development proposals. It is therefore recommended that off-site habitat compensation options are explored, such as via the purchasing of biodiversity units from a third-party habitat bank or via a financial contribution to be negotiated with the Local Planning Authority.

5. References

- Baker, J. Hoskin, R. Butterworth, T (2019) *Biodiversity Net Gain. Good Practice Principles for Development. A Practical Guide*. CIRIA. ISBN: 978-0-86017-791-3
- British Standards Institute (BSI) (2013). *BS 42020:2013 Biodiversity. Code of practice for planning and development*. British Standards Institute, London.
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- Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J. (2023). *The UK Habitat Classification User Manual Version 2.0* at <http://www.ukhab.org>.
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- Elton Ecology (2024) *Preliminary Ecological Appraisal*, Report Reference: P2567, February 2024

6. Figures

Figure 1: Site Location Plan (Overleaf)

Figure 2.1: Baseline Habitat Plan (Overleaf)

Figure 2.2: Baseline Habitat Condition Plan (Overleaf)

Figure 3.1: Proposed Habitat Plan (Overleaf)

Figure 3.2: Proposed Habitat Condition Plan (Overleaf)



Legend

 Red Line Boundary

Project:

**Proposed Industrial Unit Extension,
Pinchbeck, Spalding**

Drawing:

Figure 1: Site Location Plan

Date: 20-11-2024

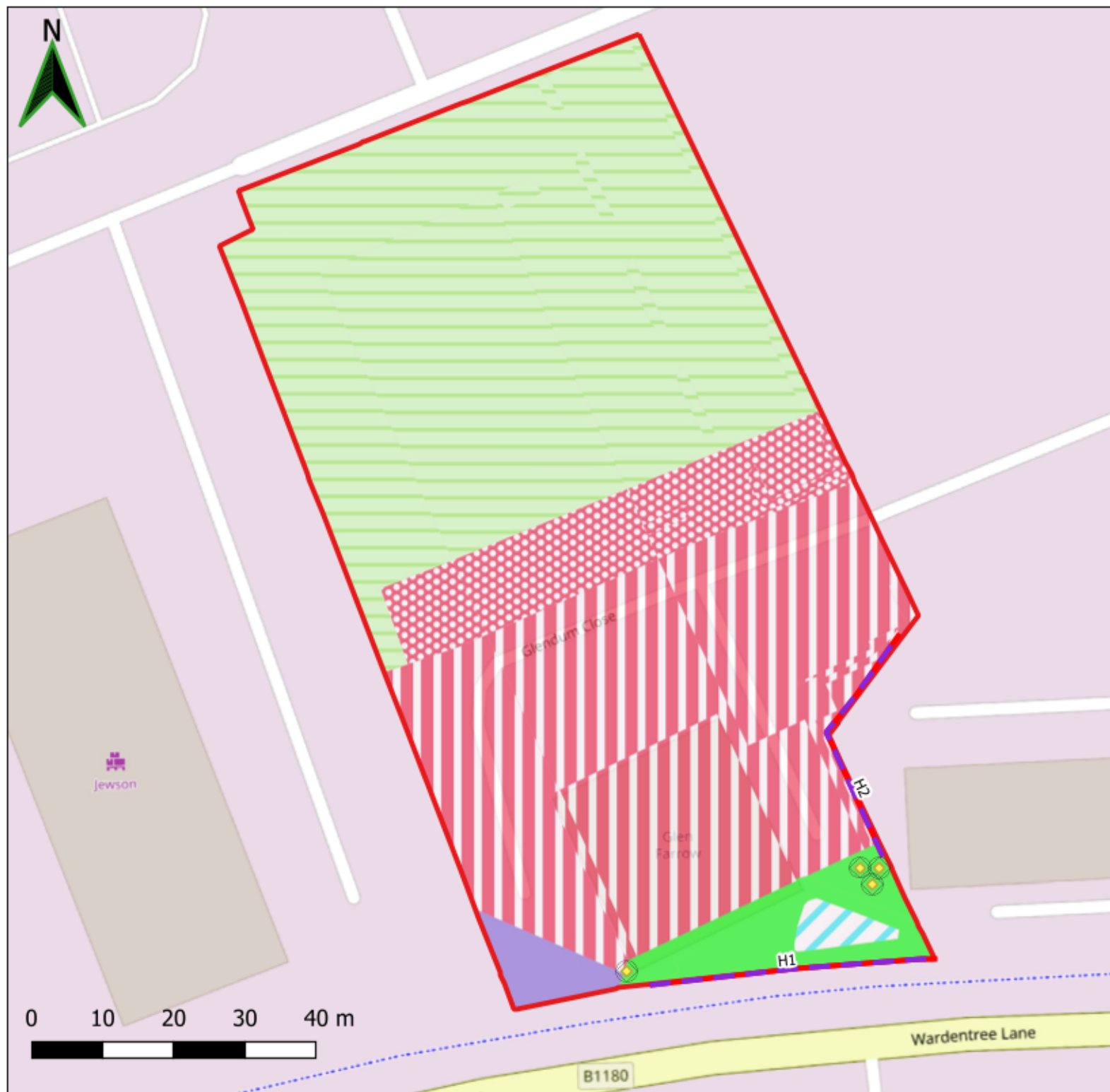
Version: FINAL

Author: JDR

Drawing No: P2625_01

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Legend

-  Red Line Boundary
-  Artificial unvegetated, unsealed surface
-  Developed land; sealed surface
-  Introduced shrub
-  Modified grassland
-  Ornamental lake or pond
-  Other neutral grassland
-  Existing Small Urban Tree
-  Non-native and ornamental hedgerow

Project:

**Proposed Industrial Unit Extension,
Pinchbeck, Spalding**

Drawing:

Figure 2.1: Baseline Habitat Plan

Date: 20-11-2024

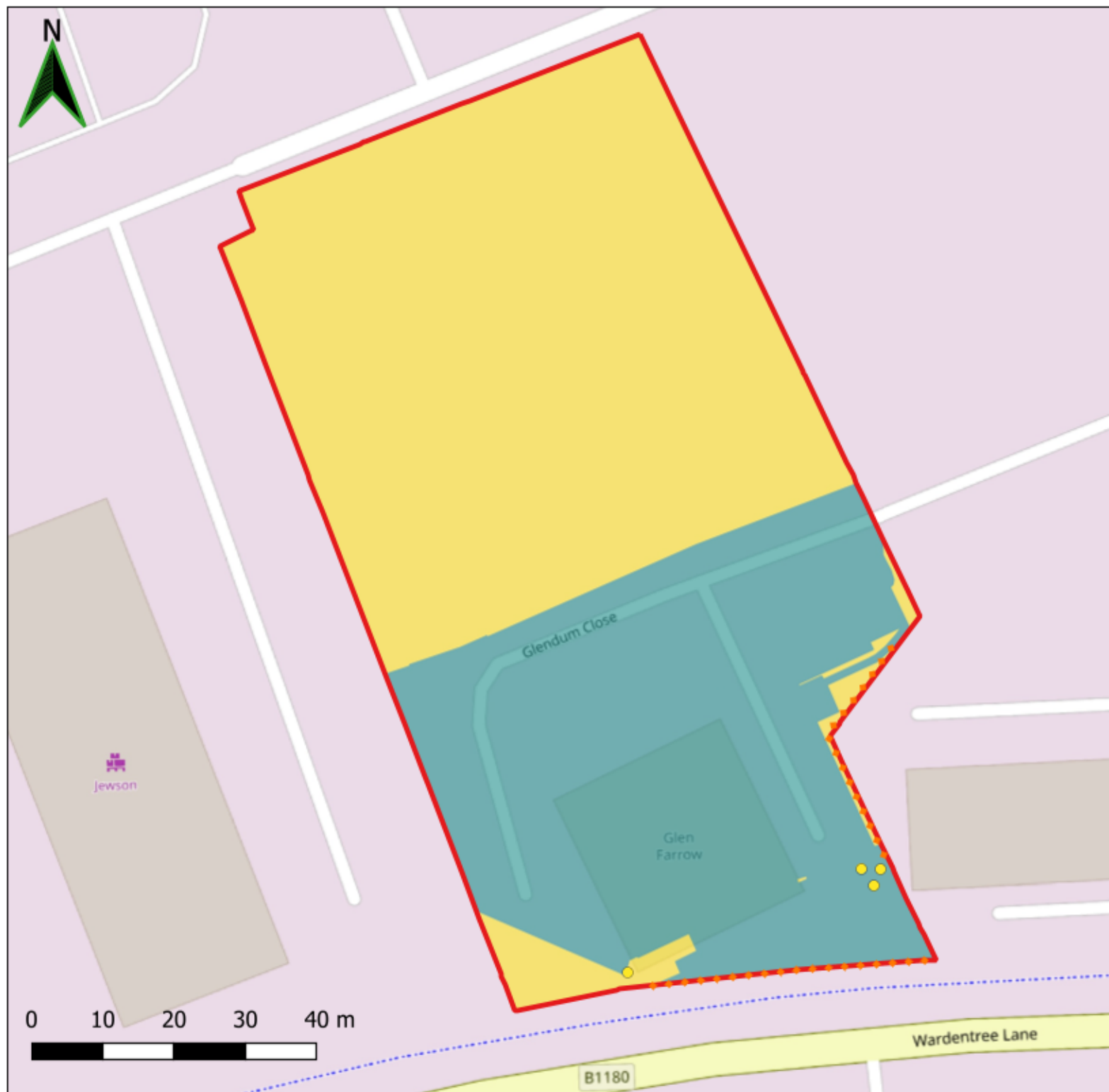
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Legend

 Red Line Boundary

Habitats Retention

 Retained

 Lost

Hedgerow Retention

 Lost

Individual tree Retention

 Proposed Lost

Project:

**Proposed Industrial Unit Extension,
Pinchbeck, Spalding**

Drawing:

**Figure 2.2: Baseline Habitat Retention
Plan**

Date: 20-11-2024

Version: FINAL

Author: TE

Drawing No: P2625_2.2

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Legend

- Red Line Boundary
- Baseline Habitat Condition
 - Moderate
 - Poor
 - N/A - Other
 - Condition Assessment N/A
- Baseline Hedgerow Condition
 - Poor
- Baseline Individual tree Condition
 - Good

Project:

**Proposed Industrial Unit Extension,
Pinchbeck, Spalding**

Drawing:

**Figure 2.3: Baseline Habitat Condition
Plan**

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Version: FINAL

Author: TE

Drawing No: P2625_2.3

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Legend

- Red Line Boundary
- Developed land; sealed surface
- Introduced shrub
- Modified grassland
- Ornamental lake or pond
- Hedgerows Proposed EDIT ME
- Species-rich native hedgerow
- Proposed Small Urban Tree

Project:

**Proposed Industrial Unit Extension,
Pinchbeck, Spalding**

Drawing:

Figure 3.1: Proposed Habitat Plan

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Version: FINAL

Author: TE

Drawing No: P2625_3.1

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Legend

Red Line Boundary

Proposed Habitats Condition

Poor

N/A - Other

Condition Assessment N/A

Proposed Hedgerow Condition

Poor

Project:

**Proposed Industrial Unit Extension,
Pinchbeck, Spalding**

Drawing:

**Figure 3.2: Proposed Habitat Condition
Plan**

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Appendix 1: Planning Policy & Legislation Summary

This appendix serves as a summary of relevant policy and legislation. It is not intended to supersede the policy or legislation documents to which it refers, and the relevant full documents should always be consulted prior to decision making.

National Planning Policy Framework 2023

Biodiversity is a material consideration under the National Planning Policy Framework (2021). Relevant text to biodiversity from the NPPF is described below.

"180. Planning policies and decisions should contribute to and enhance the natural and local environment by:

[...]

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;"

"185. To protect and enhance biodiversity and geodiversity, plans should:

[...]

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. "

"186. When determining planning applications, local planning authorities should apply the following principles:

[...]

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate."

The Environment Act 2021

Schedule 14 makes provision for biodiversity gain to be a condition of planning permission in England. The biodiversity net gain relevant percentage is currently set to 10% by the Act.