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Planning Department
South Holland District Council
Council Offices
Spalding
PE11 2XE

12th December 2025

Reference H14-1170-25

Dear Sirs

Re: Change of Use of existing building to Class E Research & Development including new first floor installation and alterations consisting of new windows and doors, mechanical plant and PV panels.

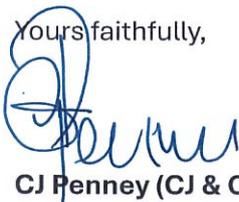
Further to our submission of our previous the Biodiversity Net Gain Statement we write to confirm that it is our opinion that the development is exempt from providing the 10% mandatory biodiversity net gain because

“The development impacting habitat is of an area below the “de minimis” threshold of 25m2 and no prior habitat is present”

Hopefully this now satisfies your requirements.

We look forward to hearing from you that the application has been validated.

Yours faithfully,



CJ Penney (CJ & CA Penney Consulting Ltd)

Biodiversity Net Gain (BNG)

Exemption Statement

For: Change of use of existing building to Class E Research & Development, including new first floor installation and alterations consisting of new windows and doors, mechanical plant and PV panels.

Planning Reference: South Holland Council H14-1170-25

At: G & J Peck Office, Offices & Premises Elsoms Way Pinchbeck Spalding

Completed By: Colan Bartram – PDG Architects Ltd

Date 02/12/2025

The Biodiversity Gain Requirements (Exemptions) Regulations 2024

1. Article 7 ('General requirements: applications for planning permission including outline planning permission') of Part 3 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended by Regulation 5 of Part 4 of The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 has introduced national validation prerequisites for planning applications relating to Biodiversity Net Gain (BNG).

2. Schedule 14 of the Environment Act 2021 introduced the concept of BNG into planning legislation, stating that "the biodiversity gain objective is met in relation to development for which planning permission is granted if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least [10%]".

3. Schedule 14 of the Environment Act 2021 additionally mandates that biodiversity gain objectives will be achieved through the imposition of planning conditions, thus constituting a post- permission process.

4. However, certain types of development for which planning permission is required are exempt from biodiversity net gain requirements and planning conditions. These are outlined in The Biodiversity Gain Requirements (Exemptions) Regulations 2024

5. The development proposals for this application meets the following exemption criterion from the Regulations:

Section 4 of The Biodiversity Gain Requirements (Exemptions) Regulations 2024, also known as the "de minimis exemption", states the following: The biodiversity gain planning condition does not apply in relation to planning permission for development which:

(Condition 1) does not impact an onsite priority habitat, and

(Condition 2) impacts less than 25 square metres of onsite habitat that has a biodiversity value greater than zero; and less than 5 metres in length of onsite linear habitat. The proposed development meets Conditions 1 and 2 of Section 4 of The Biodiversity Gain Requirements (Exemptions) Regulations 2024.

6. State how this application meets the exemption criterion stated above:

This project is for a change of use of an existing building and internal works. Applications for change of use without operational works is not considered "development" under the relevant act, so BNG is not required in such cases. Existing sealed surfaces (like existing buildings) are assigned a zero score in the BNG metric, meaning no net gain is required for their loss.

The proposed development does not impact a priority habitat and impacts less than 25 square metres of onsite habitat or 5m of on-site linear habitat that has a biodiversity value greater than zero, thereby meeting Condition 2 of Section 4 of The Biodiversity Gain Requirements (Exemptions) Regulations 2024.

7. Provide aerial imagery and photographs (or alternative sources) and captions to evidence your statement.



Aerial image from Google Maps – main building in the centre of the site surrounded by sealed surfaces. Works to envelope of the building. NO LOSS OF ECOLOGY, AND ALSO SEALED SURFACES



View of east side of building from south – tarmac access surface, Planting to boundary NO LOSS OF ECOLOGY, AND ALSO SEALED SURFACES



View of east side of building from south – tarmac access surface, Planting to boundary WORKS TO ELEVATION ONLY



*View of north end of building from east boundary – tarmac / stone chippings / concrete access surface
WORKS TO ELEVATION ONLY. NO LOSS OF ECOLOGY, AND ALSO SEALED SURFACES*



*View of north end of building from west – concrete access surface
WORKS TO ELEVATION ONLY. NO LOSS OF ECOLOGY, AND ALSO SEALED SURFACES*



*View of west elevation from the west – concrete access surface
WORKS TO ELEVATION ONLY. NO LOSS OF ECOLOGY, AND ALSO SEALED SURFACES*



*View of west elevation from the west –concrete access surface
WORKS TO ELEVATION ONLY. NO LOSS OF ECOLOGY, AND ALSO SEALED SURFACES*



*View of western section of land
NO WORKS ON THIS SECTION OF LAND – RETAINED AS IS.*



*View of SE corner of the building, west side and south front - concrete access surfaces
WORKS TO ELEVATION ONLY. NO LOSS OF ECOLOGY, AND ALSO SEALED SURFACES*



*View of front south of the building - concrete access surfaces. Planting to the boundary
WORKS TO ELEVATION ONLY. NO LOSS OF ECOLOGY, AND ALSO SEALED SURFACES*



*View of front south of the building - concrete access surfaces. Planting to the boundary
WORKS TO ELEVATION ONLY. NO LOSS OF ECOLOGY, AND ALSO SEALED SURFACES*