

Sent via email only: Buttery, Lucy <lbuttery@sholland.gov.uk>

13 August 2022

Dear Lucy,

RESPONSE TO: H14-1218-21 Land at Yews Farm Spalding Road Pinchbeck PE11 3PB – hybrid application – full permission for 100 homes and outline for 300 homes with landscaping and infrastructure

Lincolnshire Wildlife Trust continues to place a **HOLDING OBJECTION** in regards to the above planning application.

Habitats Regulations (Screening) Assessment (April 2022)

In short, we appreciate the applicant has now undertaken and submitted a screening assessment in regards to the various designated sites relating to The Wash, North Norfolk and Gibraltar Point. It did not however cover the nearest Special Area of Conservation (SAC), Baston Fen, which is a significant omission in the report.

Furthermore, we feel the report has not addressed issues in regards to potential direct and indirect impacts on The Wash Special Protection Area features. There are significant concerns presently about the populations of some of the species listed, for instance, redshank. Any further burden upon these species will have a negative impact, and as rightly identified recreational pressure is likely to be the cause of any additional impact.

Within Kings Lynn and West Norfolk the Borough Council has recognised that any such large developments have the potential to impact the designated sites within The Wash in a multitude of ways, and they have set up a strategic approach to mitigate and compensate for those impacts, which have to be in place prior to the planning process and consent. As has North East Lincolnshire Council in regards to similar issues in the Humber Estuary designated sites.

I would encourage the applicants, other potential developers and the Council to consider this strategic approach now.

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Local and nationally designated sites

The applicant still has not however address our concerns in regards to direct and indirect impacts on national and local designated sites, plus our own nature reserves, which are very nearby. We would welcome discussions directly with those developing the whole site, and the associated road infrastructure. We are open to helping find innovative, design solutions to alleviating impacts on these precious sites. We will continue to object unless these issues are addressed.

Omission of documentation

In November 2021 the Environment Bill gained Royal Assent to become an Act, which mandates Biodiversity Net Gain to a minimum of 10% to be delivered. Although this does not become mandatory for TCPA applications until 2023, it is expected that developments within this transition period should address the requirement, and I can testify to the fact many developers are within Greater Lincolnshire of their own accord. There has been no UK Habitats Assessment survey with an accompanying Biodiversity Metric (3.1) calculation for baseline setting, there has been no proposed plan to meet the mandatory 10% and there is no evidence of a management & monitoring plan for the 30-year period as required.

This is the first phase of housing (100 homes with outline for a further 300), and then there are identified further phases for this Sustainable Urban Extension. Therefore, the BNG requirement should be undertaken now to set an example for those phases that follow, particularly as construction of this phase will most likely be occurring in 2023.

Local planning requirements

There has, in our opinion, been limited effort made by the applicant to address local and national planning requirements and policies including, but not exclusively those relating to:

- SHDC's enhanced requirement under the Environment Act (2021) for biodiversity, and under the NERC Act (2009).
- SHDC's requirement to seek to enhance and protect sites of local wildlife and geological importance.
- The policies within the South East Local Plan, particularly those relevant to the Trust's 3 strategic goals, on Biodiversity and Geodiversity, minimising fragmentation of natural habitats and protecting designated sites at all levels and priority habitats and species.

In conclusion

We are in a biodiversity and climate 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 they state protecting is not enough anymore, we need to recover nature and the natural environment so it functions to deliver all the ecosystem services we require. For the above reasons, Lincolnshire Wildlife Trust continues to place an **holding objection** to this planning application (100 homes) and the outline planning request (300 homes).

Please feel free to contact me with any queries.



Yours sincerely,

Tammy Smalley
Head of Conservation

