



SENT BY EMAIL ONLY TO: planningadvice@sholland.gov.uk

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RESPONSE TO H14-1286-25: Erection of a mixed use commercial site for 11 industrial units & 4 office units

Dear Jennifer Chance,

Lincolnshire Wildlife Trust wishes to place a **holding objection** on this application until further ecological information is provided, and the Statutory Biodiversity Metric has been used to assess biodiversity value of the site and demonstrate how a 10% gain will be achieved.

The site is located less than 100m from Vernatt's drain, a Local Wildlife Site (LWS). This area is rich in grassland flora and wetland vegetation, and additionally there are records of otter within the drain, as well as water vole in the vicinity. Vernatt's Drain also provides connectivity to Vernatt's Nature Reserve, a statutory designated Local Nature Reserve (LNR), located about 350m southwest of the proposed site. No ecological information has currently been provided for the development area. The habitats on site should be assessed by a suitably qualified ecologist to determine their potential to support protected species.

The Biodiversity Net Gain Exemption Statement for the application claims that it falls under the de minimis exemption, stating that *"The ground is predominantly hardstanding with no significant soil horizon or vegetated habitat that would register a demonstrable biodiversity value under the statutory biodiversity metric"*. However, satellite imagery shows this to be untrue, with grassland and scrub clearly visible when viewing the site using Google Maps streetview. In addition, it states that *"The site has been used for industrial purposes and ancillary car parking/storage for a large neighbouring industrial unit for many years."* However, when historical satellite imagery available on Google Earth is examined, only northeast portion of the site appears to be used for parking. In the rest of the proposed site there appears to be no sign of industrial use, with the majority of the area having existed as grassland since before the industrial estate was developed. In order for the de minimis exemption to apply, the development must not impact more than 25 m² of onsite habitat. When measured on Google Earth, the grassland area was found to be at least 1500 m², greatly exceeding the de minimis threshold. This means that it is a statutory requirement for a 10% biodiversity net gain to be achieved, as mandated by the Environment Act 2021. The baseline value of habitats on site should be calculated by an ecologist, with a 10% gain achieved either by the creation of appropriate habitats on the proposed development site, or by the purchase of offsite biodiversity units.

Lincolnshire Wildlife Trust is a company limited by guarantee registered in England, no. 461863 and is registered as a charity, no. 218895 VAT no. 613 9067 44

In conclusion, Lincolnshire Wildlife Trust would like to place a **holding objection** on this application until ecological surveys have been conducted, and the baseline BNG value has been calculated. In addition, a 10% biodiversity net gain should be achieved either by on site habitat creation, or purchase of offsite units.

The Lincolnshire Wildlife Trust hopes these comments are helpful at this stage and welcomes further discussion relating to the points covered. Please do not hesitate to contact me if you have any queries or need clarification regarding the comments provided.

Yours sincerely,

A handwritten signature in black ink, appearing to read "LW".

Louisa Williams
Conservation Officer