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Planning Department
South Holland District Council
Priory Road,
Spalding, Lincolnshire,
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Friday 10th April 2026

Dear Sir/Madam,

RE: Proposed Industrial Units at Stephenson Avenue, Pinchbeck - (Ref:H14-1286-25) – Second Revision Submission

I write to enable continuity regarding discussions pertaining to the above application, which was originally submitted in December 2025.

It is understood that the originally allocated planning officer will no longer be seeing this case through to the decision, in which this note is aimed to enable some continuity and updates with regards to the key points raised by the previous case officer and stakeholders so far.

Our original submitted proposal was for a higher density of development in an attempt to maximise the use of the space on the site, and deliver the highest possible amount of public benefit and availability of small, affordable light commercial space within the locality.

There were a few points of resistance regarding the original proposal, in which we have revised the plans and proposals in order to encompass consideration to such reservations, which remaining sympathetic to our original aim.

As such, we propose a less-intensified, but largely similar development for 11 small industrial units; 10 are proposed to be let out to small local businesses, and the single larger unit will be retained by the applicant to support his own small business.

I'll address the reservations voiced as part of the previous submission in turn:

1) **Use Classes**

The previous case officer had questioned the intended final use case, which I discussed would be difficult to completely ascertain, owing to the rigidity of the planning system not being reflective of the reality of the use of these types of units.

This development is intended to be relatively flexible and universal to enable the greatest benefit to the local community, and to facilitate the operation and support of the locality as much as practicable. However, owing to the modest dimensions of each unit (being of around 72 square meters each), none are suitable for most general industrial use. The applicant does not anticipate these units to be occupied by any businesses carrying out intensive industrial processes nor significant manufacturing operations.

The largest of the three units are is to be used by the applicant for his own construction business, largely for the storage of equipment and materials.

The units were designed in mind to largely support the storage requirements and some minor ancillary operations for small local businesses predominantly. Such examples could include local tradesmen utilizing the space to store materials or tools, or someone operating a small

online business with a requirement for a small place to store their stock. Deliveries to the site would be infrequent and minimal, and is not intended to be accessed by large heavy goods vehicles.

As such, the use classes for this development should be largely considered in the context of B8 for storage, although some businesses may extend into the realms of Class E(g)(i)(previously Class B1).

2) Access and Manoeuvring

The previous case officer expressed concern that the previous submitted proposal was too intensified; likely not incorporating sufficient car park sizing for vans, and a lack of pedestrian walkways.
Another stakeholder voiced concerns about turning circles for emergency services.

The revised proposal addresses all of this, utilising the de-intensification of the proposal to free up site area to incorporate all of these suggestions:

- The proposed parking would be considered to be well in excess of the requirements for a purely B8 use class development, so there is sufficient surplus capacity to accommodate some of the units being utilized for ClassE(g)(i) use.
- 1.5 meter pedestrian walkways are now incorporated around the perimeter of the units, in addition to a specific walkway adjacent to each parking space for each unit. Each unit now only has one allocated parking space in front of each unit - but there will be sufficient excess space on site for brief loading or unloading also. Car Parking surplus, disabled spaces and cycle parking spaces remain located on the east and west of the site to support units with additional parking requirements.
- Additionally, every parking space is now oversized (most are 6 meters long, or longer; and all are at least 3 meters wide. There will still exist an amount of surplus parking as part of the revised proposal to enable greater parking requirements for Class E(g)(i).
- A hammerhead turning area has been incorporated at the end of the site to factor in the comments from the local authority regarding the turning availability of emergency service vehicles; although I would also suggest that there are plenty of other roads and sites in the locality which have been granted consent, and feature a much more restricted access provision than this proposal enabled from the start.

Other than the de-intensified approach, there are no revised changes to the proposed access to and from the highway over the original submissions. No objection was deemed to be to that in principle.

3) Biodiversity Net Gain

The consultee responses from the local authority's BNG Ecologist and Lincs Wildlife Trust have been reviewed and discussed. After discussion with the previous case officer, it was agreed to provide a metric and associated BNG documentation to accompany this revised proposal.

This is a site in the middle of a large industrial estate, that was previously used for storage to support the ancillary needs of the neighbouring industrial business. It is surrounded by densely populated heavy industrial units in an urban area, and this is evidently not a site which has ever provided any meaningful sort of biodiversity nor habitat value. This equally, was never the intent nor the purpose of the BNG legislation; attempting to drag brownfield sites, perfectly suited to development such as this, into the scope of the regulations.

The local authority's BNG Ecologist appeared to make their assessment from historic satellite imagery, which did not reflect the correct baseline condition of the site, and would suggest that no site survey was performed prior to making such comments. The 'hedge' referenced was a large patch of brambles that had grown through from the neighbouring side of the fence; and the site has been used to store piles of aggregate and inert waste from the maintenance operations of car park of the neighbouring unit that this site once formed part of. I can confirm that when the baseline survey was carried out in autumn 2025 prior to the original application submission, it was a bare piece of ground with all of those features removed – as doing so was a condition of the completion of the sale from the previous owner to the applicant.

The additional comments from Lincs Wildlife Trust were considered, but also not correct regarding this site's use - again relying on the historic satellite imagery, instead of conducting a site visit, with the same aforementioned comments equally as applicable. Planning inspectorate decisions regard that assessments of baseline value should be made by verified site conditions over remote sensing, of which no site visits appeared to be carried out by either consultee prior to making their comments.

This site is completely surrounded by heavy industrial developments, all of which cumulatively produce a vastly greater environmental impact daily than is proposed for a small light industrial and largely storage development proposal. If such wildlife in Vernatt's Drain is currently flourishing as the consultee has suggested, it has clearly not been impacted by the tens of granted planning consents for far heavier industrial use cases in recent years – so it would be incorrect to suggest such a comparatively minor development such as this, fully enveloped by heavier industrial use around it shielding Vernatt's Drain from any perceived or projected impact, is going to have any demonstrable or notably negative effect on the wildlife.

All of the species mentioned within the consultee's response pertain to wetland and riverside habitats, which this site clearly isn't – and to suggest that this development would have any adverse effects on wildlife that would have never resided there in the first place is also a misleading assessment.

It would also be prudent to refer to the previously granted consent for this site, which was for a similar floor area of equivalent type development (reference: H14-0402-20), which attracted no consultee comments of adverse potential affects to local wildlife in Vernatt's Drain or otherwise at that time (infact, no comments at all from the Environmental Protection Officer). I'd also like to draw reference to other developments which were granted consent in the same postcode locality in recent years:

- H14-0265-20 - Proposed re-fuelling facility for HGV's incorporating over ground storage vessel to include fuel and AdBlue and including associated new drainage
    - This site is directly adjacent to Vernatt's Drain, and this development was granted consent, with no notable impacts on wildlife. This was for a development with a notably higher risk of contamination.
- H14-0264-19 - Construction of industrial units, lorry and trailer storage/parking along with the associated access
    - This site is in closer proximity to Vernatt's Drain, and again, a full ecological survey was carried out identifying no impacts of the development to the local wildlife other than the potential displacement of some ground nesting birds.
    - This was for a much larger site than this proposal, with heavier industrial use.

Irrespective of the above, the applicant has proposed a suitable and sympathetic scheme that creates a number of varied habitats on site, including species rich grassland, species

rich native hedgerows and native species tree planting – although arguably a net *area* loss as a result of the metric scoring, a clear gain in hedgerow metric scores.
Planning inspectorate decisions reference sites with a low baseline value such as this should actively resist overly mechanistic reliance on the metric calculation, instead focusing on clear functional biodiversity gain. This reinforces that the -0.43 unit deficit highlighted within the attached metric is not determinative, particularly in light of the +0.89 unit hedgerow gain. All of this data has been referenced in the now attached Biodiversity Gain Plan.

4) **Other Consultees**

The remainder of the following other consultees had no notable objection to the original proposal – the revised proposal is a similar, but de-intensified version of that; and likely to cause equivalent or lesser impacts, and therefore it would be suggested original comments regarding the former proposal will still stand with equal credit and merit.

The only exception to this was the PEDALs consultee response, which was only given in light of a technical issue during the export of the plan, and no consideration to the wider merits of the proposal – irrespective, that has been addressed as part of this revision also.

I trust the above and attached documents are sufficient to address of the necessary concerns, and the applicant looks forward to receiving a decision in due course.

If you require any further elucidation or clarification on the above or attached documentation, please do not hesitate to contact me.

With kind regards,

Tom Hyde
(Agent; for and on behalf of Tawny Homes Ltd)

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