Lincolnshire Wildlife Trust

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Maxine Simmons
Case Officer
Priory Rd
Spalding
PE11 2XE

Dear Ms Maxine Simmons,

H16-0136-23: Proposed residential development of 76 dwellings, including demolition of existing glass houses & auxiliary buildings with the retention of Ivanda House at Ivanda Nursery Monks House Lane

Lincolnshire Wildlife Trust wishes to register a **holding objection** on this application until further ecological surveys are conducted at appropriate times of the year and biodiversity net gain as a result of the development is incorporated into the design of the project.

The only site survey we can find reference to took place on 4th November 2022. This is not an appropriate time of year to conduct such a survey and therefore will give an inaccurate idea of the ecological value of the site. It is therefore not surprising that evidence of protected species was not found on site. It is likely that any habitat survey will have underestimated the ecological value of the site, however we are unable to find reference to such a survey in the uploaded documents. We must insist that ecological information is gained via an onsite survey at a more appropriate time of year, between late March and mid-October.

We suggest that a UKHABs survey is undertaken to assess the habitats present on site, as this is what must be used in order to calculate the Biodiversity Net Gain as stated in:

- CIEEM-CIRIA-IEMA Good Practice Principles for BNG
- BNG British Standard BS8683:2021
- CIEEM BNG Report Templates

The assessment must be conducted by an ecologist with practical experience of UKHabs surveys and should reach FISC Level 4 as best practice.

We note that paragraph 5.8 in the PEA references the need to 'prevent loss of biodiversity and species/habitats of principle importance in the UK', as well as citing the NERC Act 2006 duty to conserve biodiversity. Due to the current biodiversity crisis

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current planning legislation, such as the NPPF and the South East Lincolnshire Local Plan, call not only for a conservation of biodiversity, but also for a gain in biodiversity.

The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment.

Paragraph 174: *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;*

The South East Lincolnshire Local Plan

3.3.12 *Development proposals should also protect, and where possible enhance biodiversity, geodiversity and green infrastructure*

7.2.14 *Development can also incorporate a number of simple, low-cost measures to deliver biodiversity benefits and enhance priority habitats and species, such as, the use of bat roost boxes, green roofs or walls, and integrating nesting opportunities into buildings and green infrastructure. The use of swift bricks on new developments in Boston in particular, would help minimise the decline in swifts, a priority species. This positive approach will also help the Local Planning Authorities fulfil their 'biodiversity duty' (identified by the Natural Environment Rural Communities Act 2006) and help improve biological resilience to climate change. Good practice can be found in the Climate Change Adaptation by Design - A Guide for Sustainable Communities51 and Planning for a healthy environment – good practice for green infrastructure and biodiversity*

Each planning application should demonstrate how the natural environment has been assessed to ensure no net loss of biodiversity and how delivery of biodiversity net gain and contribution to a nature recovery network has been included. This is especially true of this site, with the PEA stating that '*Some of the habitats on site, particularly the grassland, are considered likely to be of significant local importance to a variety of wildlife.'.*

The measures set out in paragraph 5.8 of the PEA are supported in principle by the Trust, however we require that baseline conditioned are assessed using UKHABS mapping, and the predicted gains as a result of the development are outlined in detail. We also require that a management plan is provided for the site, outlining how the biodiversity gains will be maintained and who will the responsible party.

We ask that biodiversity net gain is delivered for this development to a minimum of 10%. We are aware that the Environment Act does not make this a mandated requirement until November 2023 however it is expected that developments within this transition period should address the requirement in light of the current biodiversity crisis.

In conclusion

Lincolnshire Wildlife Trust would like to register a **holding objection** on this application until further ecological information can be reviewed. We also require evidence of a baseline biodiversity calculation value for the site, and details of how biodiversity net gain will be delivered, ideally to a minimum of 10% with a 30-year management and monitoring plan.

If you have any queries regarding the above, please do not hesitate to contact me.

Yours sincerely

Beth Fox

Conservation Officer