

Bryan, Jacob

From: Beth Fox <bfox@lincstrust.co.uk>
Sent: 10 May 2023 15:33
To: _planningadvice
Subject: H16-0373-23 Lincolnshire Wildlife Trust response
Attachments: LWT response.pdf

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Good afternoon,

Please find attached the response to the planning H16-0373-23 (Demolition of school building and erection of two-storey teaching block) from the Lincolnshire Wildlife Trust.

Kind regards,

Beth Fox (she/her)
Conservation Officer
Lincolnshire Wildlife Trust

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10 May 2023

Dan Allen
Case Officer
Priory Rd
Spalding
PE11 2XE

Dear Dan Allen,

H16-0373-23: Demolition of school building and erection of two-storey teaching block with associated parking and landscaping and temporary siting of classroom units, construction of temporary access and car parking and temporary hardstanding during construction period at Tulip Academy Spalding - Waterside Campus Neville Avenue

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.

In the Preliminary Ecological Appraisal (PEA) it is stated that the field survey took place in January 2023. 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 likely that any habitat survey will have underestimated the ecological value of the site. 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.

The Trust would ask that the updated field survey that needs to be completed in relation to this development is a UK Habitat Classification (UKHAB) survey, rather than a Phase 1 Habitat Survey. UKHAB is the new expected industry standard for such surveys as it provides more detail and is less open to interpretation than the JNCC's Phase 1 Habitat Survey. The UKHAB survey must be conducted by an ecologist with practical experience of UKHAB surveys and should reach FISC Level 4 as best practice. UKHAB is also the required survey method for Biodiversity Net Gain matrices. Both of these requirements are 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.

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While we are pleased to see that a Biodiversity Net Gain (BNG) assessment has been completed for this development we are disappointed to see that a gain of only 0.14% is predicted and no plans have been proposed to increase this figure. This figure is based on a biodiversity baseline value that was calculated using results of a field survey that took place in January 2023. As previously mentioned, this in an inappropriate time of the year for such a survey and will likely mean that the baseline biodiversity for the site was too low, meaning that the predicted gains are too high. the field survey must be redone at an appropriate time of the year, and the results from this survey should be used to produce a new BNG report for the site.

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.

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.

The South east Lincolnshire Local plan (paragraph 3.3.12) states that *‘Development proposals should also protect, and where possible enhance biodiversity, geodiversity and green infrastructure’*. Policy 28 relating to the Natural Environment states that *A high quality, comprehensive ecological network of interconnected designated sites, sites of nature conservation importance and wildlife-friendly greenspace will be achieved by protecting, enhancing and managing natural assets.*

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.

The proposed development site is within 2km of 8 Local Wildlife Sites. We have concerns about the impacts of this development specifically on Arnold’s meadow (also a nature reserve) and the coronation channel. Section 6.1.3 of the PEA states that there will be no impacts of the development on these sites, however given their proximity to the development we disagree. We therefore require mitigation measures be put into place to limit the disturbance caused. Given the location of the proposed development site within 2 km of 8 Local Wildlife Sites, a statutorily designated LNR and a Lincolnshire Wildlife Trust reserve, there is opportunity to provide key connecting habitat for wildlife with this development. We would like to see this considered in any new plans submitted for this development.

The enhancement measures suggested in the PEA are severely lacking. The planting of new trees does not adequately offset the removal of a mature tree given that the new tree will most likely be a sapling, taking years to fully replace the lost habitat. Bird and bat boxes, while a positive addition, are not sufficient ecological enhancement for this development.

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

