

11 August 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 (LWT) submitted comments on a previous version of this application on the 10th May 2023 where we registered a holding objection. These comments should be read alongside this previous response.

LWT note the submission of a field survey undertaken at the correct time of the year and therefore consider our comments pertaining to the previous survey resolved. We also note that the predicted biodiversity net gain (BNG) has increased from an overall gain of 0.14% to a 46.79% increase in hedgerow units and a 3.23% increase in habitat units. In our previous comments we asked for gain to a minimum of 10%, and the exceedingly high gain in hedgerow units does not mitigate for the below minimum gain in habitat units as BNG good practice guidelines demand that gain be like-for-like. While we appreciate that the relevant requirements in the NPPF and the local plan have been fulfilled as some gain is predicted to be achieved, LWT will retain our holding objection until gain is delivered to a minimum of 10%. We have taken this stance in light of the fact that the climate and biodiversity crises are not only clearly upon on, but are worsening at a dramatic rate. We therefore do not have the time to wait for local plan and policy review to start implementing changes. The NPPF has clearly stated the need for BNG for some time, with it becoming mandatory in November, clearly demonstrating the need for this policy. LWT ask that the LPA considers these factors when determining which applications should be granted approval as well as the conditions applied to these developments.

In our previous comments LWT highlighted the proximity of the site to no fewer than 8 local wildlife sites and requested additional mitigation for this fact. We are disappointed to see that no such mitigation has been provided and that the applicant has once again concluded that the development will not impact these sites. In addition to this, LWT made clear in previous comments that the suggested ecological enhancement measures were not sufficient yet no additional measures have been detailed by the applicant at this stage. Below are some further suggestions that the applicant could consider:

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- Bird and Bat bricks or boxes designed into development plans. These are a good way to encourage wildlife into an area and to allow students to see and engage with their natural environment.
- Consider including swift boxes where appropriate in developments as well as standard garden bird boxes. Guidance at [NHBC guide for nest boxes](#)
- Habitat areas for insects, amphibians, reptiles and mammals could enhance the development further and be incorporated into the design. E.g.
 - o log piles and retention of dead wood for insects,;
 - o rock piles and hibernacula for reptiles;
 - o management of amenity areas, grassland and banks for pollinator species
 - o [hedgehog friendly fencing](#).
 - o Suitable vandal proof interpretation should be included on site to explain the features provided and their importance for wildlife.

There is no management plan available on the planning portal and so we assume that one has not been provided. Therefore, we ask that an appropriated management plan is secured via a condition. This plan should be for a minimum period of 30 years.

In conclusion

Lincolnshire Wildlife Trust would like to maintain our **holding objection** on this application until BNG to a minimum of 10% is predicted to be delivered, additional mitigation and enhancement measures detailed and a management plan secured.

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

Yours sincerely

Beth Fox

Conservation Officer

