Lincolnshire Wildlife Trust

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30 June 2023

Mark Simmonds
Case Officer
Priory Rd
Spalding
PE11 2XE

Dear Mark Simmonds,

H16-0521-23: Erection of buildings to comprise up to 70,000 square metres (Gross Internal Area) of Class B8 (storage or distribution) floorspace to include ancillary Class E(g) (office) floorspace and provision of associated infrastructure including utilising existing vehicular access from B1173. Outline with means of access to be considered at Land North of B1173 Barrier Bank and West of A16 Spalding (Lincs Gateway)

The Ecological Appraisal by Allied Ecology sent to the Trust separately. We ask that such environmental information is freely accessible via the planning portal in future and are happy to discuss this further.

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 Phase 1 habitat survey referenced in the Ecological Appraisal took place in January 2022, this is not an appropriate time for such a survey to be undertaken. This limitation is acknowledged in section 4.3.1 of the Ecological Appraisal however we find the justification insufficient for proceeding with the survey at this time and ask that the survey is re-done at an appropriate time of the 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.

Due to the current biodiversity crisis 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.

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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.

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 recommended ecological enhancements in section 7 of the Ecological Appraisal references the delivery of biodiversity net gains and management and monitoring plans but only in regards to the provision of appropriate planning conditions. This is not sufficient, in order to ensure gains on site enhancements should be incorporated into the plans from the earliest possible stages to ensure the best outcomes for nature. Without any baseline calculations for the site it is not possible to assess whether the enhancements suggested would result in adequate mitigation or gain in biodiversity. We therefore ask that the findings from the new survey are imputed into the Defra BNG calculator and a gain in biodiversity post development is demonstrated also using this tool.

The existing arable nature of the site benefits both ground nesting birds in the form of breeding habitat and birds of prey for hunting habitat. The updated ecological surveys should take care to survey for these species and adequality mitigate and provide gain for this loss of habitat.

The removal of any scrub on site would need to be mitigated for via additional planting. We also expect to see gain in addition to mitigation. The tree line on site is acknowledged as likely qualifying as priority habitat and an important ecological feature. We therefore ask that the mitigation hierarchy is followed prior to decisions regarding its removal being made. If removal is deemed necessary it should be noted that the new planting referenced in section 4.5.4 should be of native

species, and that gain should be provided in addition to mitigation. As well as this, saplings are not of the same biodiversity value as the mature trees that will have been removed, and sapling survival rate to maturity is often low. These factors should be carefully considered when considering the number of new trees to plant.

The proposed site location sits within 2km of no fewer than 6 Local Wildlife Sites (LWS) which is recognised in section 3.3 of the Ecological Appraisal. We disagree with the conclusion drawn in section 3.3.2 that 'no direct effects on the LWS or surrounding non-statutory designations…will occur under the proposals'. The proximity of the sites makes negative impacts as a result of the development highly likely, meaning we would need to see mitigation measures suggested to limit these impacts before lifting our holding objection. There is also the issue of connectivity, given the 6 nearby LWS the proposed location site for this development has the potential to be a key connecting area between the sites but no consideration to this issue can be found in the uploaded material.

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