From: Beth Fox <bfox@lincstrust.co.uk>
Sent: 27 April 2023 15:02
To: _planningadvice
Subject: H16-1203-22 Lincolnshire Wildlife Trust response
Attachments: LWT response.pdf

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Good afternoon,

Please find attached the response to the planning H16-1203-22 (Proposed extra care accommodation with associated access, car parking, and landscaping) from the Lincolnshire Wildlife Trust.

Kind regards,

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

Mobile: 07983 855472



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Registered offices: Banovallum House, Manor House Street, Horncastle, Lincolnshire, LN9 5HF.

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27 April 2023

Dan Allen
Case Officer
Priory Rd
Spalding
PE11 2XE

Dear Dan Allen,

H16-1203-22: Proposed extra care accommodation with associated access, car parking, and landscaping at Land adjacent Roman Bank Spalding

Lincolnshire Wildlife Trust would like to **maintain a holding objection** against this application as the concerns raised in our initial response have not been addressed.

In the 'covering letter-response to consultee comments dated 17 April 2023-amendment 3' document we note that the applicant has defended their lack of biodiversity net gain by citing that gain to a minimum of 10% is not yet mandatory. While this is true, we urge the local authority to consider that the biodiversity and climate crises that are clearly upon us mean that we do not have time to wait for the Local Plan review for the policies set out within it to catch up. The NPPF has clearly stated for some time the need for BNG, it becoming mandatory in November, reflects that the policy has not led to it being widely adopted in practice and the need to address the biodiversity crisis. In light of this information, we argue that a gain in habitat units of only 2.25% is unacceptably poor. We also wish to highlight that this gain is not valid in terms of like-for-like habitat replacement. The applicant plan on planting six small trees and nine medium trees to offset the loss of bramble scrub. Not only will these trees be saplings and take considerable time to provide mature habitat, but trees do not provide have the same ecological value that bramble scrub does. Bramble scrub provides multiple key ecological services for wildlife that the trees will not replace. We note that the applicant has reasoned that the lack of space on the site and available landscaping area is a limitation in providing adequate mitigation, this is simply not sufficient reasoning. Gains in biodiversity need to be incorporated into site plans from the earliest possible stage in the process to avoid these issues, and where mitigation and gain is not possible to deliver onsite, **they must be delivered offsite.**

In addition to this lack of gain in biodiversity we stand by our original comments regarding the management plan associated with this development, in that it is not sufficient. We also consider our comments surrounding the experience level of the ecologists undertaking the surveys, as well as the timing of the watercourse survey, to still be relevant as no amended material has been received concerning these issues.

Across the Boston Borough and South Holland District we are seeing a series of developments coming forward that truly are not even reflecting some of the national and local policies and legislation – from housing developments to NSIPs.

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The Trust are sending a clear message, we want developers to address incorporating considerations from the outset of a scheme being designed, instead as a late addition. We will happily talk with a developer in the pre-application stage if they need pointers.

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

Yours sincerely

Beth Fox
Conservation Officer