

Sent via email only to: planning@sholland.gov.uk

27th September 2024

Dear Mark Niland,

H17-1097-23 – Land East of Surfleet Bank and West of Woad Farm: Proposed plant-based protein extraction facility and anaerobic digester plant.

Lincolnshire Wildlife Trust wishes to register a **holding objection** on this application pending the submission of plans to mitigate potential significant negative impacts on local protected sites and species.

While we appreciate that this application achieves a net gain for biodiversity, it also has potential significant adverse effects for the Wash - Special Protection Area (SPA), Ramsar site, National Nature Reserve (NNR), Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI); Surfleet Lows SSSI, and 7 Local Wildlife Sites (LWS).

The ecological reports state:

"Given the nature of the Proposed Development, the reasons for the designations identified, and the distance between them; it is considered likely that the Proposed Development may result in adverse impacts to various statutory and non-statutory designations, through air or water pollution, which will need to be considered further."

These potential effects need to be address and mitigated against.

Further, protected species – namely water voles (*Arvicola amphibius*) and badger (*Meles meles*) are likely using the proposed site. The ecology report states:

"3.20 There was evidence of mammal tracks into the mixed shrub, potentially from a badger. Due to the local signs of badger observed, prominent mammal tracks nearby, and the near potential badger sett, we would suggest this scrub is subject to a further scoping survey to ascertain the presence or likely absence within the Site."

...

3.35 Multiple potential water vole burrows were observed in the banks of the southern ditch (D2), situated a foot above the surface water and approximately 100m apart. Grass nearby was cleanly cut at a 45o C angle, indicating the potential presence of water vole. An additional scoping survey and associated camera trapping is highly recommended."

The report goes on to state that the proposed development would have a significant negative impact on water vole – should they be present on site. Further surveys are required to establish the presence of protected species on site, and mitigation plans made for any species found. Water vole are GB Red List: Endangered, and are fully protected under section 9 of the Wildlife and Countryside Act 1981 (as amended).

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Schedule 5 of this Act makes it an offence to intentionally damage or obstruct access to water vole burrows.

We are in a climate and biodiversity crisis, and we all need to play our part in addressing that, as recognised by the UK Government in their 25-Year Environment Plan, where it is stated that protection is not enough anymore - we need to recover nature and the natural environment so it functions to deliver all the ecosystem services we require.

The Lincolnshire Wildlife Trust hopes these comments are helpful at this stage and welcomes further discussion relating to the points covered.

In conclusion: Lincolnshire Wildlife Trust would like to register a holding objection on this application pending ecological mitigation plans and protected species surveying.

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

Hannah Curtis

Conservation Officer

