

## Porter, Karen

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**From:** Niland, Mark  
**Sent:** 15 October 2025 11:49  
**To:** G R MERCHANT LTD  
**Cc:** \_planningadvice  
**Subject:** FW: H18-0879-25 ecology comments

Hi Sarah,

### H18-0879-25 - Land adjacent 39 Custom House Street

I hope you are well?

Please see the comments from ecology below on this site. We will need a Preliminary Ecological Appraisal prior to determination please.

Thanks  
Mark

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**From:** Hill, Grace <Grace.Hill@e-lindsey.gov.uk>  
**Sent:** 15 October 2025 10:45  
**To:** Niland, Mark <Mark.Niland@sholland.gov.uk>  
**Cc:** De-Ruyck, Chris (ELDC) <Chris.De-Ruyck@e-lindsey.gov.uk>  
**Subject:** H18-0879-25 ecology comments

Hi Mark,

Please find our comments for this application below.

H18-0879-25 - Land adjacent 39 Custom House Street Sutton Bridge Spalding Lincolnshire PE12 9UJ

Erection of 8 dwellings

Documents reviewed:

- BNG Statutory Metric
- Preliminary Ecological Appraisal
- Biodiversity survey and report
- Indicative proposed site plan

Comments

Ecological Considerations:

- We believe that this application will require a Preliminary Ecological Assessment with a protected species survey (primarily Nesting Birds) to be provided pre-determination. The results from this PEA may reveal the need for more detailed species surveys.
- Local Planning Authorities have a statutory duty to consider the conservation, protection, and enhancement of biodiversity when determining planning applications. In addition, the presence of certain habitats, species, and designated sites protected by UK and European law on or near to a development site is a material consideration within the planning process.
- For these reasons, it is important that a Preliminary Ecological Appraisal is provided to help identify and evaluate any features of ecological interest on/adjacent to a proposed development site, and identify any potential mitigation measures required in line with the exiting wildlife legislation and planning policies. This assessment is often requested prior to planning applications being determined

as it helps ensure that any mitigation methods to protect specific species are feasible implemented before the proposed development can be signed off.

**BNG Comments**

- Overall we are confident that this site will achieve 10% net gain onsite however some adjustments to the BNG metric and plan will be required pre-commencement, as described below.
- It is not evident where any ruderal ephemeral will be 'retained' or 'enhanced' in the post development plans and with them being such tiny sections of habitat I would be cautious as to accept that they could be either retained or enhanced in any capacity given the scale of works to be completed onsite. Therefore, we request that all ruderal ephemeral land is lost and the habitat parcels that were previously retained or enhanced be altered to an alternative created habitat e.g. developed land/ sealed surface.
- We also believe that the proposed modified grassland creation should have a target habitat condition of moderate condition rather than good condition due to a potentially high area of grass covered by tree canopy and increased urban pressures in the area (such as increased foot fall, cat and dog fouling etc...)
- With these alterations the site will still achieve 16.29% net gain with an overall increase of 0.668 habitat area units.

Conclusion: We are confident this site can achieve 10% mandatory net gain even with the amendments request pre-commencement, however we strongly suggest that the applicants amend the proposals/BNG metric as early in the planning process as possible to minimize uncertainty, avoid delays, and avoid any risk of the applicants failing to satisfactorily discharge the biodiversity gain condition pre-commencement. We require a PEA to be submitted pre-determination. Once this has been provided we will review it and provide our comments back.

Please get in touch if you have any further questions,

Kind Regards,

Grace Hill

BNG Ecologist

South & East Lincolnshire Councils Partnership

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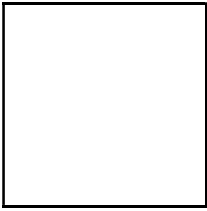


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