

**Sibley, Sally**

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**From:** Hill, Grace <Grace.Hill@e-lindsey.gov.uk>  
**Sent:** 09 April 2026 15:08  
**To:** Allen, Daniel  
**Cc:** \_planningadvice  
**Subject:** H23-0171-26 ecology comments

Hi Dan,

Please see below our comments regarding this application.

H23-0171-26 – Land Off Stockwell Gate Whaplode Spalding  
Residential Development of 5 Bungalows - outline approval H23-0827-22

Summary: While sufficient evidence has been submitted to determine the application, there is insufficient information at this time to confirm whether mandatory 10% Biodiversity Net Gain would be delivered on-site or off-site.

Documents reviewed:

- Habitat Regulations Assessment
- Small Sites Metric
- BNG report
- Site Plan Proposed, Location plan

Comments

Ecological Considerations:

- Having reviewed the Habitat Regulations Assessment we feel confident that the proposed development will have no likely significant on the designated features located near the site as listed below:
  - The Wash (RAMSAR, SSSI and SAC)
  - North Norfolk Coast (SAC)
  - Baston Fen (SAC and SSSI)
  - Surfleet Lows (SSSI)
  - Cowbit Wash (SSSI)
  - Thurlbey Fens (SSSI)

- We request that a total of 5 integrated universal nest bricks (e.g., S Brick, Swift Nesting Brick, Manthorpe, Swift Bricks: The ‘Universal’ Nest Brick – by Dick Newell | CIEEM) are incorporated into the external fabric of one or both buildings. These should be located at a height of 4+ m metres, on the north or east elevations to avoid overheating, and grouped colonially where possible, in accordance with best-practice guidance such as British Standard BS 42021:2022. The bricks must be installed during the construction phase and retained thereafter for the lifetime of the development.
- We also request that two integrated bat box (e.g., Integrated / Built-In Bat Boxes, Integrated Eco Bat Box | The Nestbox Company) are added to the development.
- In both cases, the authority requires the applicant to submit sufficiently detailed maps that indicate the proposed location of bird/bat boxes on-site. These are required to enhance biodiversity and to be in line with Local Plan Policy 7.2.14.
- We believe the proposed development site has potential for nesting birds. Therefore, we request a condition requiring that: *Works should not be carried out in the main nesting season (March 1st – August 31st). If not possible then a suitably qualified ecologist must perform a breeding bird survey of the site prior to any works beginning onsite. Any active nests discovered during inspections will be protected with a suitable exclusion buffer (of appropriate size to the species) to prevent disturbance and monitored until the nest is no longer active / all chicks have fledged, when the ecologist will provide a sign off for clearance work to continue.*

#### BNG Comments and Notes to applicant

- As the current proposals stand, the BNG proposals for this application show that 10% net gain would not be achieved for this site. A unit deficit of 0.6233 habitat area units are required to be accounted for by either further onsite habitat enhancement or by securing the unit deficit through offsite habitat units.
- The BNG report (Section 4.2) recommends enhancing on-site habitat to achieve *good condition other neutral grassland*. We cannot support this recommendation, as we consider *good condition other neutral grassland* to be exceptionally difficult to achieve within this type of development. This is due to an increased risk of failure arising from external pressures such as higher footfall, domestic pet activity and excretion, and increased vehicular use across the site.
- In our view, *moderate condition other neutral grassland* would represent a more realistic and achievable habitat target for this site. In addition, the applicant could incorporate the planting of a number of small trees across the site, located outside the domestic curtilage of the proposed dwellings, to help achieve the required 10% Biodiversity Net Gain on site.

#### Specific BNG condition request

- We cannot say for certain yet what further documentation we would need pre-commencement, but we believe that a biodiversity gain plan and HMMP would be required if the applicant chose to follow our recommendations of onsite habitat creation.

Conclusion: While sufficient evidence has been submitted to determine the application, there is insufficient information at this time to confirm whether mandatory 10% Biodiversity Net Gain would be delivered on-site or off-site.

Please get in touch if you have any further questions,

Kind Regards,

Grace Hill

Bsc(Hons) | MRes

**BNG Ecologist**

South & East Lincolnshire Councils Partnership

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