From: Niland, Mark
Sent: 12 September 2025 11:45
To: _planningadvice
Subject: FW: South Holland Planning Application H23-0478-25
Attachments: We sent you safe versions of your files; WSCA25 _WhaplodeStCatherineGeophysicsReport-min (1).pdf

Hi,

H23-0313-25 - Land At Peartree Hill Road

Can the email contents and the attachment please be captured into the dip. Both as 6SUP.

No requirements to consult, I have emailed the consultees directly.

Thanks
Mark

From: James Whilding <james.whilding@acorus.co.uk>
Sent: 12 September 2025 10:49
To: Niland, Mark <Mark.Niland@sholland.gov.uk>; Sarah Hopkins <sarah.hopkins@acorus.co.uk>
Cc: stewart@bowleradams.com; Paul Clarke <pclarke@clarkegroup.co.uk>
Subject: Re: South Holland Planning Application H23-0478-25

Dear Mark

Further to the request for additional information, I refer you to the attached from Allen Archaeology.

With regard to the ecologist comments, I provide the following from our AQ expert:

The effects of NH3/N on areas designated for BNG:

1. The deposition rates will certainly be much less than current fertilisation rate!
2. The Lower bounds of Critical Load are assumed, these are not natural semi natural areas of grassland and as such are not likely to have a Critical Load anywhere near the lower bound.
3. Whatever the Critical Load, it is the point at which effects can be shown to occur, it is not the point where the habitat become non-viable or every living thing is killed etc. Viable ecologies exist with much higher fertilisation rates. E.g. an arable field fertilised at 200+ kg-N/y requires much work and herbicides to remain free of native weeds etc. There are many examples of valuable habitat developing in close proximity to intensive poultry rearing farms; I have seen raised bog beginning to develop within 10 m of such farms. Some of the most diverse flora habitats I've see have developed in French drains around farms!

4. I consider any attempt to claim herbaceous grassland plants adapted to low nutrient conditions would be damaged is simply is a contrived attempt to create hysteria; this land is highly fertile and such grasslands would not develop on such land.

Manure disposal spreading:

1. Manure would be spread legally according to guidance/regs. The point of these guidance/regs is to minimise negative impacts on water quality keeping it within acceptable limits, presumably based on a high level cost benefit analysis. I would point out that the court decisions made on this matter do not prevent the spreading of manure at all; they merely make it clear that a competent authority must (meticulously if they want to avoid losing at a JR) consider the disposal routes i.e. the fate of all manures should be known, even if it passes through third parties hands, and the fate should be legal.
2. This area is part of the bread-basket of the UK; it is mostly arable land and is going to remain so (so long as food security is considered important to UK Government and the wider population). As such it will be fertilised by manures /slurries or mineral fertilisers; the sources of these fertilisers is irrelevant and whether or not the sources is any particular farm the levels of run-off and seepage into ground water will remain the same.

Other points:

1. The screening distance for locally designated wildlife sites is 2km; there are as far as we are aware no local sites within 2km.
2. The screening distance for SSSIs/SACs/SPAs/Ramsar Sites is 5 km or 10 km depending on which guidance you look at; AS Modelling and Dat assumes a distance of 10 km for all sites.
3. In this case there is only one statutory site within 10 km and this is designated for geological features.
4. The screening distances are there for a purpose, that is to screen out negligible effects whether the vector be air or water, again we assume based upon high level cost benefit analysis.
5. This site is about as far away from any habitat likely to be adversely affected by the kind of pollutants produced by intensive as you can probably get in the UK.

Finally:
As usual AS Modelling & Data would suggest that whatever the local situation, all pollution from the site itself is minimised though adoption of best available technologies/techniques and that where possible waste products are disposed of with a view to conversion of ammoniacal N into more controllable forms (less likely to be emitted ammonia or otherwise find their way into water courses).

I would be grateful if you would confirm whether there is anything else outstanding. It would also be useful to understand your thinking at this stage. This is a comprehensive application and one which satisfies policy. I have referred previously to non-planning related comments which I trust you will disregard. If necessary, I can arrange for legal comment to assist and happy to have a TEAMS call with you to run through anything which you may not understand.

I look forward to hearing from you shortly.

Kind regards

James Whilding MRICS FBIAC

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