



SENT BY EMAIL ONLY TO: planningadvice@sholland.gov.uk

9th April 2026

RESPONSE TO H23-0313-25: Amendment 2 - Updated drainage and block plans, together with revised access and visibility plans, have been submitted. Updated Biodiversity Net Gain (BNG) information has also been provided, including the biodiversity metric, baseline habitat plan and post-development habitat plan at Land At Peartree Hill Road, Whaplode Drove.

Dear Mark Niland,

Lincolnshire Wildlife Trust wishes to maintain a **holding objection** on this application until the following concerns have been addressed.

As identified by Senior Ecologist Chris De-Ruyck, there are several issues with the habitats proposed in the Biodiversity Net Gain (BNG) metric. Although the updated metric has removed the creation of good condition other neutral grassland, it still lists the creation of good condition modified grassland. This is an unrealistic condition due to the impacts of deposition of ammonia from the poultry sheds, as described in the response from Chris. Additionally, it lists enhancement of the onsite ditch to good condition, which would require it to pass all eight criteria, including achieving good water quality with no signs of pollution. The metric calculation should be adjusted, with provisions made to secure offsite biodiversity units to ensure a 10% gain is reached.

Additionally, we are concerned about the increasing number of poultry units across Lincolnshire, and their impacts on the environment. With increasingly intensive livestock development and numerous proposed applications within Lincolnshire, we strongly recommend that a cumulative impact assessment of poultry waste disposal should be undertaken.

As a case point, we refer to the successful 2025 River Action case against Shropshire Council in the River Severn catchment, which was on the basis of failure to assess cumulative impacts of an intensive livestock unit in the area, along with a failure to assess indirect environmental impacts. We also refer to the March 2025 High Court ruling that reclassified chicken manure as a “waste material” under waste management regulations, and acknowledged that nutrient run-off of phosphorus and nitrogen can lead to eutrophication of watercourses, causing significant ecological harm.

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Additionally, The Wildlife Trusts recent report quantifying risks of the pig and poultry production in the UK identified that Greater Lincolnshire had 17.8% of the English broiler flock, equating to 17,231,792 broilers. Forecast excreta output in Greater Lincolnshire was estimated at 33,086 m³ per annum, equivalent to 13 Olympic swimming pools, putting Lincolnshire as the highest region in England for poultry excreta. This creates nitrogen and phosphate potential outputs of 6,680,455 (N kg/yr) and 4,566,145 (P₂O₅ kg/yr). These numbers are likely to be an underestimate of the actual values. This development has a predicted output of 715 tonnes of waste per year which will be spread on land, likely causing increasing nutrient levels with the potential for environmental impacts. As Chris identified in his response, the neighbouring waterbodies drain into The Wash, which is a globally important habitat designated as an SPA, SAC, Ramsar, and SSSI. With this in mind, we recommend that a detailed waste management plan is produced to show the endpoint of the waste. With many new poultry units being built in the area, we reiterate our strong recommendation that a cumulative impact assessment of poultry waste disposal should be undertaken by the council.

The Lincolnshire Wildlife Trust hopes these comments are helpful at this stage and welcomes further discussion relating to the points covered. Please do not hesitate to contact me if you have any queries or need clarification regarding the comments provided.

Yours sincerely,



Louisa Williams
Conservation Officer

