**From:** Beth Fox <bfox@lincstrust.co.uk>
**Sent:** 22 June 2023 11:07
**To:** _planningadvice
**Subject:** H23-0471-23 Lincolnshire Wildlife Trust Response
**Attachments:** LWT response.pdf

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Good morning,

Please find attached the response to the planning application H23-0471-23 (Erection of 19 holiday lodges) from the Lincolnshire Wildlife Trust.

Kind regards,

Beth Fox (she/her)
Conservation Officer
Lincolnshire Wildlife Trust

Mobile: 07983 855472




Charity no. 218895. Registered in England no. 461863.
Registered offices: Banovallum House, Manor House Street, Horncastle, Lincolnshire, LN9 5HF.

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Lincolnshire Wildlife Trust

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22 June 2023

Dan Allen
Case Officer
Priory Rd
Spalding
PE11 2XE

Dear Dan Allen,

**H23-0471-23:** Erection of 19 holiday lodges, reception building, facility managers accommodation & maintenance shed, 2 fishing lakes and associated hard and soft landscaping at Bleu Raye Farm Millgate

Lincolnshire Wildlife Trust wishes to register a **holding objection** on this application until baseline ecological surveys have been undertaken, mitigation measures put in place to compensate for any loss of biodiversity. We also require that Biodiversity Net Gain is delivered to a minimum of 10% and a management and monitoring plan for a minimum period of 30 years has been produced.

We can find no baseline surveys included in the uploaded documentation. Without this information the impact the development will have on the local environment cannot be determined nor can subsequent biodiversity net gain (BNG) calculations be made. This is of particular concern given that there is likely to be significant biodiversity loss on the site given that the application form states that the land is currently 'meadow' habitat and the Construction Environmental Management Plan implies tree and hedgerow removal on site. The measures set out the Biodiversity Mitigation and Enhancement Plan are supported by the Trust in theory, but need to be considered within the context of a baseline survey and BNG calculations.

We suggest that a UKHABs survey is undertaken to assess the habitats present on site, as this is what must be used in order to calculate the BNG as stated in:

- CIEEM-CIRIA-IEMA Good Practice Principles for BNG
- BNG British Standard BS8683:2021
- CIEEM BNG Report Templates

The assessment must be conducted by an ecologist with practical experience of UKHabs surveys and should reach FISC Level 4 as best practice.

Due to the current biodiversity crisis current planning legislation, such as the NPPF and the South East Lincolnshire Local Plan, call not only for a conservation of biodiversity, but also for a gain in biodiversity.

*Lincolnshire Wildlife Trust is a company limited by guarantee registered in England, no. 461863 and is registered as a charity, no. 218895 VAT no. 613 9067 44*

**The National Planning Policy Framework** is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment.

***Paragraph 174:*** *Planning policies and decisions should contribute to and enhance the natural and local environment by: (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*

**The South East Lincolnshire Local Plan**

**3.3.12** *Development proposals should also protect, and where possible enhance biodiversity, geodiversity and green infrastructure*

**7.2.14** *Development can also incorporate a number of simple, low-cost measures to deliver biodiversity benefits and enhance priority habitats and species, such as, the use of bat roost boxes, green roofs or walls, and integrating nesting opportunities into buildings and green infrastructure. The use of swift bricks on new developments in Boston in particular, would help minimise the decline in swifts, a priority species. This positive approach will also help the Local Planning Authorities fulfil their 'biodiversity duty' (identified by the Natural Environment Rural Communities Act 2006) and help improve biological resilience to climate change. Good practice can be found in the Climate Change Adaptation by Design - A Guide for Sustainable Communities51 and Planning for a healthy environment – good practice for green infrastructure and biodiversity*

Each planning application should demonstrate how the natural environment has been assessed to ensure no net loss of biodiversity and how delivery of biodiversity net gain and contribution to a nature recovery network has been included.

We ask that biodiversity net gain is delivered for this development to a minimum of 10%. We are aware that the Environment Act does not make this a mandated requirement until November 2023 however it is expected that developments within this transition period should address the requirement in light of the current biodiversity crisis.

The work programme in the Biodiversity Mitigation and Enhancement Plan spans a period of only 5 years, this plan should cover a minimum period of 30 years in order to ensure that any gains in biodiversity are delivered in perpetuity.

**In conclusion**

Lincolnshire Wildlife Trust would like to register a **holding objection** on this application until further ecological information can be reviewed. We also require evidence of a baseline biodiversity calculation value for the site, and details of how biodiversity net gain will be delivered, ideally to a minimum of 10% with a 30-year management and monitoring plan.

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

Yours sincerely

Beth Fox

Conservation Officer