

From: Hill, Grace <Grace.Hill@e-lindsey.gov.uk>
Sent: 11 August 2026 17:36
To: Sutton, Catherine
Cc: _planningadvice
Subject: H23-0686-26 ecology comments

Hi Catherine,

Please see below our comments regarding this application.

H23-0686-26 - Land to rear of Westerly Back Bank Whaplode Drove Spalding PE12 0TT
Erection of 3 dwellings, access, landscaping and infrastructure (permission extant on site for 2 dwellings)
Documents reviewed:

- Statutory Biodiversity Metric Calculation
- Biodiversity Net Gain Specification

Comments

Ecological Considerations:

- Having reviewed this application, I believe that this application will require a Preliminary Ecological Assessment with a protected species survey (primarily Barn owl and Bat) 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 and Notes to applicant

- We request that more evidence be provided to demonstrate the rational around the baseline habitat classification. This could be in the form of quadrat data, photographic evidence or more detailed habitat descriptions. This is because I am not confident that the species list provided in the BNG specification documents appropriately reflects the species onsite as shown in the photo on the title page of the same document.
- I believe that the post-development habitats have been incorrectly classified as well.
 - At current, there is no mention of developed land creation or vegetated garden creation proposed for this application – this seems wrong given the nature of the application being the erection of 3 dwellings with associated landscaping.
 - I would also argue that the open space section of this development which is currently classified as woodland would be more appropriately classified as modified grassland with individual trees planted, with both habitats to achieve moderate condition.
 - I have done an estimated calculation of the post development habitats based off the site plan provided for this application:

1b. Habitats to be created							
Ref	A. Broad Habitat	B. Habitat type	Acceptable condition options	Condition Assessment C. Targeted condition	D. Strategic significance	E. Total Area (m ²)	Habitat units created onsite
1	Grassland	Modified grassland	Moderate, Good	Moderate	Area/compensation not in local strategy/ no local strategy	599.00	0.2078
2	Woodland and forest	Other woodland, mixed	Moderate, Good		Area/compensation not in local strategy/ no local strategy		
3	Urban	Vegetated garden	Condition Assessment N/A	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	1211.00	0.2337
4	Urban	Developed land; sealed surface	N/A - Other	N/A - Other	Area/compensation not in local strategy/ no local strategy	1129.00	0.0000
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20							
Trees	Individual trees	Urban/rural tree	Moderate	Moderate	Area/compensation not in local strategy/ no local strategy	488.33	0.1493
Totals (areas excl trees, green walls and intertidal hard structures)						2929.00	0.2928
Error Check 4						Error - Area of habitat creation must match area lost A	

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Site Name		Rear of Westerly Back Bank Whaplode Drove	
Sheet Name		Headline Results	
Headline Results			
Headline		BNG Targets Not Met A	
Trading Rules		Trading Rules Not Satisfied A	
Next steps		Scheme alterations or offsite units required	
Baseline Units	Habitat units	3.7663	
	Hedgerow units	0.3800	
	Watercourse units	Zero Units Baseline	
Post-development Units	Habitat units	1.9907	
	Hedgerow units	2.5059	
	Watercourse units	0.0000	
Total net unit change	Habitat units	-1.7756 A	
	Hedgerow units	2.1259 ✓	
	Watercourse units	0.0000	
Total net % change	Habitat units	-47.14% A	
	Hedgerow units	559.44% ✓	
	Watercourse units	% target not appropriate	
Habitats units required to meet target		2.1522	
Hedgerow units required to meet target		0.0000	
Watercourse units required to meet target		0.0000	

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○ The results of these alterations to the post-development habitats results in a net loss of 47.14% and a unit deficit of 2.15 habitat area units will need to be secured pre-commencement for this application.

- We will require our concerns to be addressed pre-determination so we can provide further comment on this application.

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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