

15<sup>th</sup> November 2023  
North Lincolnshire Council  
planning@northlincs.gov.uk

Sent by Email

Dear Ms Coggon,

**Application Reference:** PA/2023/1607

**Site Location:** Land south of A1077 Barrow Road

**Proposed Development:** Strata Homes planning for 173 dwelling residential development.

Lincolnshire Wildlife Trust [The Trust hereafter] is a conservation charity in the county with a strategic remit to support conservation of the natural world, lead on the recovery of key habitats and species, and empower local communities to take action for nature. The Trust represents the views of nearly 30,000 members across Lincolnshire. Our conservation officers have reviewed the referenced application and associated documentation against a series of criteria and wish to register a **Formal Objection**. Please find our detailed comments below;

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1. We note the biodiversity metric and associated biodiversity enhancement management plan presented within the application.

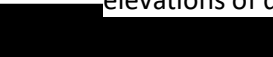
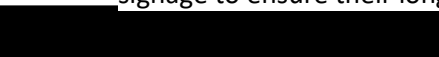
1.1 We concur with the baseline assessment calculation of 12.39 habitat biodiversity units and 1.55 hedgerow biodiversity units on the proposed development site.

1.2 We note the applicant has made endeavours to adhere to the NPPF mitigation hierarchy with the retention of the majority of hedgerows, alongside additional planting of new hedgerows and native scrub, which is welcomed.

1.3 We **strongly object** to the applicants proposal that 'Vegetated Garden' will contribute 3.13 biodiversity units of on-site habitat creation through the residential gardens for the new dwellings. We cannot identify any proposed mechanism by the applicant to ensure the gardens are retained in this format for the minimum 30 year duration. Therefore, as residential adaptation takes places over time, this will reduce the extent and habitat condition, as such it is inappropriate to include these as viable contributors to the metric and net gain calculations.

1.4 Reassessment of the on-site biodiversity enhancement with these units removed indicates a net loss of 7.08 BU's [57%]. We recommend the metric is reassessed and residual effects recalculated on this basis.

2. We note and agree with the proposed inclusion of bird and bat boxes on suitable elevations of dwellings located on the development site perimeter.

  
In reference to the PTES hedgehog sightings maps and NBN atlas, we refer to a series of records within close proximity to the proposed development site, indicating it is likely to perform a connectivity and corridor function. Taking this in the context of the proposed boundary treatment layout and fencing specification, we recommend the inclusion of mandatory hedgehog passes in all fencing sections at regular intervals and appropriate signage to ensure their long-term retention [see BHPS guidelines].  




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

## Policy

### 1. National Planning Policy Framework [NPPF]

174. Planning policies and decisions should contribute to and enhance the natural and local environment...[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

179b. Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity and development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

180.d. Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

### 2. The Environment Act [2021]

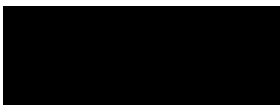
- Schedule 14: Part 1: 90A.2.3: A minimum 10% gain is required, calculated through the Biodiversity Metric and approval of a biodiversity gain plan.
- Schedule 14: Part 1: 90A.9.3: Habitat must be secured for a minimum of 30 years via planning obligations or conservations covenants.
- Schedule 14: Part 1: 90A.2.2: BNG should be delivered on-site, off-site or via a new statutory biodiversity credits scheme.

### 3. British Standard for BNG.

BS 8683:2021 Process for designing and implementing Biodiversity Net Gain.

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

Yours sincerely



Dr James Wood

Conservation Officer  
Lincolnshire Wildlife Trust



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