MEMO

North Lincolnshire Council

To: Andrew Law, Development Management

From: Alicia Morley, Place Policy & Strategy

Your Ref: PA/SCR/2025/4

Date: 16 May 2025

Subject: CORRECTION Request for a second EIA Screening Opinion for proposed new wells and 600M underground gas pipeline Wressle Wellsite, Lodge Farm, Appleby

Summary

- **Assessing the data provided by APIS regarding air pollution impacts on Broughton Far Wood SSSI and Broughton Alder Wood SSSI, and the ecological appraisal submitted for PA/2024/275, an EIA is unlikely to be required from an ecological perspective.**
- **Sensitive working methods will be required in relation to badgers, hedgehogs, nesting birds and water voles.**
- **The submitted biodiversity metric provides a reasonable baseline assessment but does not set out the measures required to achieve biodiversity net gain (BNG).**
- **Strategic significance scores in the metric are incorrect.**
- **There will be a need to secure a measurable net gain in biodiversity in accordance with Policy CS17, the National Planning Policy Framework and the Statutory Biodiversity Metric.**

Thank you for consulting Place Policy & Strategy on the above application. This response is a corrected response for my initial comments, considering further relevant information provided for PA/2024/275, pollutant data from APIS, and Natural England comments.

EIA Screening

The applicant has identified that the proposal is Schedule 2 development in relation to the Town and Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 2017.

The application site is sited within a landscape of agricultural land and woodlands, with drains, hedgerows and scattered hedgerow trees that may support protected and priority species and habitats. The pipeline route would cross several agricultural fields, to the south of the wooded area to the west of the wellsite, and cross Ella Beck, which would require safeguarding from hydrocarbon pollution. The amended pipeline does not cross the B1208 and

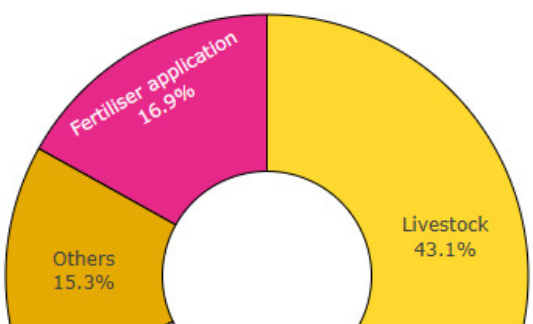
therefore is not in proximity to designated nature sites such as Broughton Far Wood SSSI and Broughton Alder SSSI and irreplaceable habitats like ancient woodland.

Air pollution at Broughton Far Wood SSSI is addressed in the ecological appraisal submitted for PA/2024/275:

> "The screening thresholds and the applicable critical loads would both be temporarily exceeded in relation to nitrogen and acid deposition. However, the baseline loads of these pollutants are already grossly in excess of the critical loads (34.46 kN/ha/year versus 10 kN/ha/year for nitrogen deposition, and 2.44 keqha/year versus 0.989 keq/ha/year for acid deposition). In comparison, the temporary process contribution from the Proposed Development is negligible (0.0040 kN/ha/year and 0.0294 keq/ha/year respectively). In this context, the temporary contribution from the Proposed Development is not likely to materially add to any adverse impacts resulting from the baseline exceedances."

The Air Pollution Information System (APIS) identifies that 95% of woodland in the UK exceed the nitrogen critical load due to more effective intake by wooded areas than shorter vegetated areas. It should be noted that, even if woodlands do exceed the critical load, the problem should not then be further exacerbated by more nitrogen intake.

As discussed in PA/2024/275, APIS provides Source Attribution for nitrogen deposited onto Broughton Far Wood SSSI. Natural England's comment has raised the concern of adverse impact on Broughton Alder Wood SSSI, and I have therefore included this site in my assessment. The APIS Source Attribution for nitrogen deposition on the two sites has been collated in **Figure 1**. The greatest contributor to nitrogen deposition at both sites is agriculture (livestock and fertiliser application combined). Local industrial sources, which are presumably only part of the "Others" category, provide a relatively minor contribution to nitrogen deposition. The proposal would thus represent a minor increase in what is already a minor contributor to nitrogen deposition on the woodland sites.



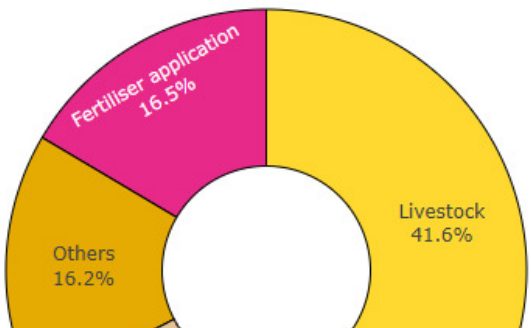


Figure 1 *Local contributions to Nitrogen deposition (KgN/ha/yr) from sources (UK) onto Broughton Far Wood SSSI (left chart), and onto Broughton Alder Wood SSSI (right chart). © APIS*

APIS suggests that the designated features at Broughton Far Wood SSSI and Broughton Alder Wood SSSI are sensitive to nitrogen deposition. However, the contribution of nitrogen from industry is low compared to the very significant impact from agriculture. The woodland feature for both sites is currently in favourable condition and the calcareous grassland in Broughton Far Wood SSSI is very species-rich, despite nitrogen deposition from the existing blast furnaces to the west. Overall, the proposed development is not likely to adversely affect Broughton Far Wood SSSI or Broughton Alder Wood SSSI.

Therefore, an EIA is unlikely to be required from an ecological perspective.

Protected and Priority Species
I have considered this application in accordance with Natural England's standing advice for protected species- http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/standingadvice/default.aspx.

The application site supports agricultural land, with hedgerows and a stream (Ella Beck) the pipeline will cross, as well as an existing access track. Hedgerows, drains, agricultural land and woodland (including ancient woodland) are adjacent to the site. With these habitats, the standing advice guides us to consider the following protected species or groups:

Habitat, building or land	Species to look for
Lakes, rivers and streams (on the land or nearby)	Breeding birds, great crested newts, fish, otters, water voles and white-clawed crayfish
Woodland, scrub and hedgerows on, or next to the site	Bats, breeding birds, badgers, dormice, invertebrates, great crested newts, reptiles and protected plants

Dormice, smooth snake and white clawed crayfish do not occur in North Lincolnshire and do not need to be considered further.

I have read the submitted preliminary ecological appraisal provided with PA/2024/275. The survey methods used and the survey effort deployed are appropriate for the site in question. The surveyors found no evidence of badgers, bat roosts, otters, water voles, great crested newts, reptiles or significant invertebrate assemblages. There is some potential for species to become established, including badgers, hedgehogs, nesting and water voles, therefore sensitive working methods will be required.

Invasive Non-Native Species
Himalayan balsam has been recorded along the whole of Ella Beck, including within the Site where the Proposed Pipeline crosses. This species is listed on Schedule 9 of the Wildlife and Countryside Act 1981 and must not be allowed to spread in the wild.

Biodiversity Enhancement
The National Planning Policy Framework states that:

> "187. Planning policies and decisions should contribute to and enhance the natural and local environment by:
>
> a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils […]
>
> b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
>
> […]
>
> 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 and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
>
> e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;
>
> […]

and

> "193 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..;"

Biodiversity Net Gain (BNG)

The applicant has submitted a biodiversity metric that provides the following information:

- On-site habitat baseline and post-development assessments.
- On-site and offsite hedgerow baselines without post-development assessments.
- Off-site habitat and watercourse baselines without post-development assessments.

Comments collated through our assessment software are set out in Appendix 2. Main points are as follows:

• The baseline map and condition assessments have been provided and appear accurate.
• Strategic significance has not been applied appropriately to baseline and post-development habitats. The government has provided the following guidance on circumstances where it is appropriate to assign high strategic significance to a habitat in the absence of an adopted Local Nature Recovery Strategy:

> Where there is no published LNRS and the habitat type is **mapped** and described as locally ecologically important **within a specific location**, within documents specified by the relevant planning authority [emphasis added].
>
> If your project delivers the mapped measure set out in the LNRS or alternative strategy (where the LNRS is not yet available) you should:
>
> • record strategic significance as low in the baseline
> • record strategic significance as high in post-intervention sheets
> • record which plan you have used in the user comments

As proposed, the project would lead to a measurable net loss of 4.43 habitat units on-site (subject to corrections on the strategic significance applied). This is equivalent to a net loss of 87.28%. The offsite baseline habitat areas and conditions identified by the applicant indicate that offsite biodiversity net gain may be possible, though we do not have firm proposals at present.

Planning conditions and a section 106 agreement will be required to secure a measurable net gain in biodiversity.

If you have any questions, please do not hesitate to contact me.

Alicia Morley
Ecologist

Annex- Ecology and Legal Protection

Badgers
Badgers and their setts (tunnels and chambers where they live) are protected by the Protection of Badgers Act 1992.
It is an offence to:

- take, injure or kill a badger - or attempt these actions
- treat a badger cruelly
- interfere with a badger sett
- possess or control a live badger
- mark or ring a badger

Nesting birds
It is an offence under Section 1 of the Wildlife and Countryside Act of 1981(WCA 1981) to intentionally take, damage or destroy the nest of any wild bird while it is use or being built. The WCA 1981 also provides that all wild birds and their eggs are protected and cannot be killed or taken except under licence.

Water voles
The water vole is fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). Details of the legislation can be found at:

Wildlife and Countryside Act http://www.legislation.gov.uk/ukpga/1981/69/contents

The Countryside and Rights of Way Act: http://www.opsi.gov.uk/acts/acts2000/ukpga_20000037_en_7#pt3-pb8-l1g81

Appendix 2 - Detailed comments on Statutory Biodiversity Metric

Reference F-1 Off-Site WaterC' Baseline, row 1

No evidence provided for strategic importance of ditches in this location

---

Reference E-1 Off-Site Hedge Baseline, row 4

No evidence provided for strategic importance of hedgerows in this location

---

Reference E-1 Off-Site Hedge Baseline, row 3

No evidence provided for strategic importance of hedgerows in this location

---

Reference E-1 Off-Site Hedge Baseline, row 2

No evidence provided for strategic importance of lines of trees in this location

---

Reference E-1 Off-Site Hedge Baseline, row 1

No evidence provided for strategic importance of lines of trees in this location

---

Reference B-1 On-Site Hedge Baseline, row 1

No evidence provided for strategic importance of hedgerows in this location

---

Reference D-1 Off-Site Habitat Baseline, row 7

No evidence provided for strategic importance of woodland in this location

---

Reference D-1 Off-Site Habitat Baseline, row 6

Modified grassland is not identified as a priority in any local strategy

---

Reference D-1 Off-Site Habitat Baseline, row 4

Modified grassland is not identified as a priority in any local strategy

---