

# MEMO

**North  
Lincolnshire  
Council**

**To:** Scott Jackson, Development Management  
**From:** Alicia Morley, Place Planning & Housing  
**Your Ref:** PA/2025/1004  
**Date:** 27 October 2025

**Subject:** Planning permission to erect 23 dwellings and associated infrastructure (Phase 2)  
Land off Applefields, Wrawby (adjacent Phase 1)

## Summary

- The preliminary ecological appraisal was submitted for assessment. The survey methods used and the survey effort deployed are appropriate for the site in question.
- Precautionary method statements have been provided for breeding birds, bats, amphibians and terrestrial mammals.
- Protected species survey is required before the works commence to identify the approach to be undertaken regarding avoidance, mitigation and licensing.
- Biodiversity enhancements have been detailed, however, swift bricks should be incorporated into the design, to support declining local populations.
- There will be a net loss of area habitats and hedgerows on-site. To deliver Biodiversity Net Gain, Biodiversity Units need to be purchased from a habitat bank.
- Proof of allocation and purchase will need to be provided alongside the relevant BNG documents for discharge of the deemed condition.

Thank you for consulting Place Planning & Housing on the above application.

## 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>.

I have read the submitted preliminary ecological appraisal. The survey methods used and the survey effort deployed are appropriate for the site in question.

Sensitive working practices have been recommended for breeding birds, bats, mammals and amphibians, with the presence of an Ecological Clerk of Works (EcOW) due to potential of the site being used for foraging and commuting individuals, and limited potential for roosting (bats) and breeding (birds).

Natural England has identified the proposal site as being within an "amber risk zone" for great crested newts - a European Protected Species. The potential for harm to great crested newts (and thus an offence) therefore needs to be taken into account on this site. The watercourses largely scored low on the Habitat Suitability Index (HSI), hence the use of precautionary method statement.

Further surveying was recommended for reptiles, to include seven weekly checks between April and October and providing artificial refugia, and for aquatic mammals, through a phase two survey. The results of these surveys should be provided for assessment prior to determination to inform any potential mitigation or design changes.

Additionally, further surveying was recommended for aquatic mammals through undertaking a phase two survey. This would comprise of motion sensor camera traps to be deployed for a minimum of 14 nights, with the data collated utilised to inform potential mitigation.

In my opinion, the reptile surveying is not necessary, however, the phase two survey for aquatic mammal surveying should be undertaken. The results of this survey should be provided for assessment prior to determination to inform any potential mitigation or design changes.

### **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..;”

Native trees and hedgerows are proposed to be planted along the streets and around the public open space, alongside the swale and attenuation basin (established during Phase 1 development). Bat boxes are proposed for 7 of the 23 dwellings, with 5 bird boxes to be placed on fencing and garages. Hedgehog highways are to be placed throughout the site.

No swift bricks have been detailed which would be of biodiversity value for the site. Swift bricks have been shown to support a range of common garden bird species as well and therefore are increasingly being used for the benefit of multiple species.

### **Biodiversity Net Gain (BNG)**

I have assessed the submitted Statutory Biodiversity Metric and Biodiversity Net Gain (BNG) Plan. 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 been applied appropriately to baseline and post-development habitats.
- Baseline habitats comprise of other neutral grassland, bare ground, artificial unvegetated, unsealed surface and native hedgerow with trees – associated with bank or ditch. All but a section of the hedgerow will be lost.
- Habitat creation will consist of built linear features, developed land; sealed surface, other neutral grassland, rural tree, sustainable drainage system, vegetated garden and native hedgerow.
- There will be total net loss on the site with a loss of -59.63% for area habitats and -53.91% for hedgerows, equating to a loss of -2.45BU and -3.68BU respectively.

The headline results are as follows:

Combined	On-site pre-intervention (baseline)	Loss of pre-intervention (baseline) habitats	Post-intervention	Net change	
	BU	BU	BU	BU	%
Area habitats	4.11	4.11	1.66	-2.45	△ -59.63
Hedgerows	6.83	4.37	3.15	-3.68	△ -53.91
Watercourses	0.0	0.0	0.0	0.0	0

We note that strictly speaking the northern field (classified as bare ground) should be considered cropland, however, as both habitats are of low distinctiveness and score lowly in the metric, we will not request the amendment.

Since the unit deficit cannot be achieved on-site and presumably not on blue-line land, Biodiversity Units need to be purchased from a habitat bank, following the BNG hierarchy. Proof of allocation and purchase will need to be provided alongside the relevant BNG documents for discharge of the deemed condition.

**Recommended Conditions**

I can advise on conditions once the results of the aquatic mammals survey have been submitted for assessment.

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

### **Bats**

All species of bat are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of The Conservation of Habitats and Species Regulations 2017 making all species of bat European Protected Species. 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](http://www.opsi.gov.uk/acts/acts2000/ukpga_20000037_en_7#pt3-pb8-l1g81)

The Conservation of Habitats and Species Regulations 2017:

[The Conservation of Habitats and Species Regulations 2017](http://www.legislation.gov.uk/uksi/2010/20100490/1)

<http://www.legislation.gov.uk/uksi/2010/20100490/1>

### **Great Crested Newts**

The great crested newt is fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of The Conservation of Habitats and Species Regulations 2017 making it an European Protected Species. Details of the legislation are the same as those for bats (see above).

### **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.

### **Otters**

The otter is fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of The Conservation of Habitats and Species Regulations 2017 making it an European Protected Species. Details of the legislation are the same as those for bats (see above).

### **Reptiles**

The adder, common lizard, grass snake and slow worm are protected against intentional killing or injuring under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended).

### **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-l1q81](http://www.opsi.gov.uk/acts/acts2000/ukpga_20000037_en_7#pt3-pb8-l1q81)

## **Appendix 2 – BNG Metric Software Comments**

B-2 On-Site Hedge Creation, ref 1

Native hedgerow to be created along the northern perimeter. Targeted to achieve Moderate condition. Strategic significance classified as location ecologically desirable but not in local strategy.

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A-2 On-Site Habitat Creation, ref 6

Sustainable drainage system that feeds into the Phase 1 development, targeted to meet Moderate condition (attenuation basin and swale).

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A-2 On-Site Habitat Creation, ref 5

Other neutral grassland to be created within the POS, targeted for Moderate condition.

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A-2 On-Site Habitat Creation, ref 4

Rural individual trees to be planted around the development (front gardens and POS), targeted to meet Moderate condition.

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A-2 On-Site Habitat Creation, ref 3

Vegetated garden to be created, target condition N/A.

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A-2 On-Site Habitat Creation, ref 2

Developed land; sealed surface to be created (dwellings, garages, roads etc).

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A-2 On-Site Habitat Creation, ref 1

Built linear features to be created.

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B-1 On-Site Hedge Baseline, ref 1

Native hedgerow with trees - associated with bank or ditch in Good condition. A section will be lost. Strategic significance has been classified as formally identified in local strategy.

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A-1 On-Site Habitat Baseline, ref 2

Northern agricultural field that has been left in its ploughed state and not replanted. In Poor condition and to be lost.

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A-1 On-Site Habitat Baseline, ref 3

Artificial unvegetated, unsealed surface to be lost.

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A-1 On-Site Habitat Baseline, ref 1

Former agricultural field that has been left to fallow and developed into other neutral grassland in Moderate condition. ONG to be lost.

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