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Issued by email only

RE: COSSINGTON ROAD, SILEBY – STATEMENT OF EVIDENCE

Please find enclosed statement of evidence in relation to the forthcoming Public Inquiry for the Appeal (Ref: APP/X2410/W/21/3287864) of refused Planning Application (Ref: P/21/0491/2).

RELEVANT QUALIFICATIONS

I am Oliver Ramm, a Director at RammSanderson Ecology Ltd, with responsibility for a team of 47 environmental professionals and support staff. The Practice is registered under the Chartered Institute of Ecology & Environmental Management's Registered Practice scheme, effectively a quality mark for our profession.

I have 17 years' experience in the field of Ecological Consulting and my relevant qualifications and professional memberships are summarised as follows:

- BSc (Hons) Degree in Environmental Biology
- Member of the Chartered Institution of Ecology & Environmental Management (MCIEEM)

I have been a consultant ecologist working on housing developments for the duration of my career to date, in addition, I have been involved in projects in the renewables, utilities, infrastructure, commercial and industrial sectors and worked in all corners of the UK. I have also been involved in a number of conservation and estate management schemes. I have worked on a number of schemes in Charnwood Borough and completed the surveys of this site myself so as to be as familiar as possible with the conditions of the site, which is the subject of this case.

DOCUMENTATION

Although initially, a third party undertook a habitat survey of the site, RammSanderson Ecology has been involved with the proposed development on land adjacent to Cossington Road since April 2021. We prepared the Ecological Impact Assessment report submitted with the planning application and a separate Biodiversity Impact Assessment Metric (Completed using the DEFRA Metric 2.0, which was the current and most up to date assessment metric available at the time), which was submitted during the planning application determination period. We also worked collaboratively with the Design Team and landscape architects Golby+Luck to ensure the landscape masterplan was designed in such a way as to deliver a net gain for biodiversity, both on paper in the metric, and in real terms on the ground.

The planning application was refused by Planning Committee on 17 September 2021. There were no ecological reasons for refusal.



I have reviewed the ecological documentation submitted with the outline planning application and stand by the findings of the reports.

Any ecological survey is however a snapshot in time and as several consultee responses mention birds and wildfowl in particular, I revisited the site in January 2022 to ensure site conditions remain consistent with the submitted documentation, and to investigate the use of the site by wintering wildfowl. I discuss the use of the site by birds and wildfowl in the specific consultee response section below. In summary, I can confirm that the site conditions are consistent with those set out in the submitted report, which remains an accurate assessment of the ecology of this site, and can stand by its findings.

ECOLOGY CONSULTATION

Charnwood Borough Council's (CBC) ecologist requested that a Biodiversity Net Gain Assessment was provided with the outline application, which was completed and duly submitted in April 2021. No further specific consultation responses from statutory or non-statutory consultees have been received.

THIRD PARTY REPRESENTATIONS

I have read the responses of the public, elected members, and third party representations.

I have summarised the main themes of concern in relation to ecological matters as:

- 1 Loss of habitat
- 2 Loss of hedges
- 3 Effect on wintering wildfowl
- 4 Effects on birds of prey
- 5 Effects on wildlife – general decline
- 6 A Strategic approach as per Biodiversity 2020.

In response to the ecology comments within the third party representations, I have the following comments:

1. The main field compartment is intensive arable land without any field margins of note. It has received regular inputs of fertilisers, herbicides and pesticides and been driven over and compacted by agricultural machinery to the point where the soil biome is much departed from a natural state. This is a highly managed environment and uniform in its lack of diversity. These activities and winter ploughing will have caused run off to the brook and degraded the quality of the water within it over many years also. Some patches of starwort and fool's water-parsley cling on in pool sections of the off-site brook, but most of the brook is devoid of vegetation in the channel. The proposals provide a betterment here by stabilising the soils, protecting the brook from run off with a suds basin, and a great deal of new planting and land set aside for a good quality species-rich grassland habitat to develop over time, and for people to formally have access to it. Assessing this change formally using the DEFRA 2.0 Metric against the outline masterplan resulted in a 36.68% net gain. It should be noted that this calculation will need to be updated to reflect the final layout with a Reserved Matters Application at a later date.
2. The site is bounded on three sides by hedgerows which are in poor condition and under intensive mechanical flail annual management. A line of Leyland cypress are also present along the southern boundary. The boundary vegetation will be managed in a more sympathetic manner, and any gaps planted up with native hedgerow reinforcement planting. Additional hedgerows will be planted between the edge of development and landscaping areas. Assessing this change formally using the DEFRA 2.0 Metric shows a 73.87% increase in hedgerows at the site. It should be noted that this calculation will need to be updated to reflect the final layout with a Reserved Matters Application at a later date.
3. The site was revisited in January 2021, with the survey commencing on site at 6am and concluding around 11am. The objectives were two-fold, to confirm site conditions as previously assessed remained accurate, and to assess whether wintering wildfowl were present at all. No wildfowl (such as geese, ducks or wading birds) were recorded at all. In contrast a brief stop at Cossington Meadows LRWT reserve showed plentiful wintering wildfowl using this site. This brief survey of Cossington Meadows was carried out to check

conditions were satisfactory for wildfowl to be present and that migrating /overwintering species were present locally at the time.

4. Birds of prey using this site are likely to be limited to buzzard, kestrel and sparrowhawk. Buzzard and kestrel are likely to benefit from the proposals, in that they will have higher quality foraging resources over grassland than over the arable field compartment however disturbance levels would be higher post-development. Sparrowhawk may also benefit from an increase in garden birds brought into the site in nest boxes and by bird feeding by residents; however the effects overall are assessed as neutral, and nugatory in their impact level.
5. The proposals include a substantial area of landscaping which will mature into a species rich grassland with significant numbers of trees and hedgerows also being planted. This is a long term benefit to local wildlife on a site which is relatively devoid of ecological interest presently. I would argue the general decline for wildlife at this site, has already happened as a result of decades of pesticide, fertiliser and herbicide use as agricultural practices have intensified and as a result of the proposals, part of this site is being restored to a much more natural state than currently exist.
6. The comment relating to Biodiversity 2020 is valid, but only partially references the relevant section of this document. The quoted section was: *"we will take a strategic approach to planning for nature. We will retain the protection and improvement of the natural environment as core objectives of the planning system"*. That paragraph in full is given below as its preceding and following parts are contextually important: *"Through reforms of the planning system, we will take a strategic approach to planning for nature. We will retain the protection and improvement of the natural environment as core objectives of the planning system. We will pilot biodiversity offsetting, to assess its potential to deliver planning policy more effectively."* This expanded quotation, now contextualised, casts a different light. The reference to Biodiversity 2020 is a policy matter, which Governments, national and local have responded to through the auspices of, updates to the National Planning Policy Framework in 2019 and 2021, the Environment Act 2021 and the adoption of the use of biodiversity offsetting, which has come to fruition in the use of Biodiversity Impact Assessment practices, such as the DEFRA Metric, which was used in the assessment of this site. Whilst allocated sites are assessed as core objectives of the planning system, they are not, even with Biodiversity 2020 in place, the single route for planning approval. We are therefore compliant with Biodiversity 2020, in so far as progress has been made against the targets set by this document.

I trust the information provided here is satisfactory at this time, should you have any queries, or require any clarifications, please do not hesitate to call me directly.

Yours sincerely,

Oliver Ramm MCIEEM

For and on behalf of RammSanderson Ecology Ltd.

Enclosures: n/a