

RammSanderson Ecology Ltd Osprey House Merlin Way Quarry Hill Industrial Estate Derby DE7 4RA

OUR REF: RSE\_4942\_L1\_V1

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Mr C. Stott Nineteen47 Ltd.

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## RE: LECONFIELD ROAD, NANPANTAN -

RammSanderson was instructed to assess the ecological impacts of a development of approximately 30 dwellings at Leconfield Road, Nanpantan, Loughborough (as referenced PSH447 in the Strategic Housing Land Availability Assessment for the Charnwood Borough Council Draft Local Plan). Following this an Ecological Impact Assessment (RSE\_4942\_01\_V2) was completed and should be read in conjunction with this letter. Within the supporting documents a DEFRA BIA Metric is provided demonstrated the deliverability of a net gain for biodiversity in accordance with NPPF (2021).

The site comprises a species-poor semi-improved grassland field compartment, with areas of scrub and some newly planted trees with Burleigh Wood (ancient woodland) adjacent to the site boundary. Overall, the site is of low value both botanically and in its ability to support protected species on site. Protected species surveys were carried out in relation to reptile species; however none were identified on site following a suite of surveys.

The site has been assessed within the Charnwood Borough Council Ecological Assessment of potential housing sites within the Borough¹. In CBC's ecological assessment report, Appendix 2² states the overview of ecological value/risks from development of PSH447 are "potential impacts on PNS" [protected/notable species] and gives the site a C/D rating. Grade C states:

C - Site with a risk of loss, but a balance could be achieved by on site measures if the developable area is reduced

The site has since been reclassified by Charnwood Borough Council within the local plan 2021-37 Ecological Assessment Report (Addendum, June 2021<sup>3</sup>) as being of a grade D:

D - Site contains either a high proportion of priority habitat or botanically diverse habitat; or, contains potential for/evidence of protected species. Unlikely to achieve sufficient on site mitigation to make development acceptable but it may be possible if the developable area is significantly restricted. There may be risks of ecological harm associated with position in landscape. (See case studies C and D)

This increase to grade D following a site reassessment by Charnwood Borough Council was due to "the presence of acid grassland indicator species within an area of the site". No detail is given within this document as to what the indicator species were, when the survey was undertaken (however out of season survey work is alluded through throughout this addendum and the original 2019 report) or where on site these plants were located. No acid grassland indicator species were observed during the phase 1 habitat survey carried out by RammSanderson, which indicates that although these plants may be present on site, they are likely to be present in very low numbers as they were not detected during a thorough phase 1 habitat survey and are therefore not characteristic of the grassland as a whole. The habitat on site more closely matched the phase 1 habitat descriptions for species-poor semi-improved grassland given the presence of false oat grass, cocks-foot and meadow foxtail within the sward, all of which are indicator species for semi-improved neutral grassland. If, for instance, these plants occur adjacent to Burleigh Wood, they could be retained within the landscape buffer proposed with the scheme put forward for promotion in the Local Plan.

As such, the site is considered to not be greatly botanically diverse and does not support a high proportion of priority habitat as the habitats on site are common and widespread. The ability of the site to support protected or notable species and the potential for development to cause impacts on protected & notable species has been assessed within the ECIA report and it has been demonstrated that the scope for impacts to protected species is limited to commuting and foraging habitat with a low risk of badger sett building.

<sup>&</sup>lt;sup>3</sup> Charnwood Borough Council Local Plan 2021-37 (June 2021). Ecological Assessment Report: Ecology Evidence Update. Addendum















<sup>&</sup>lt;sup>1</sup> Charnwood Borough Council Local Plan 2020-36 (June 2019). Ecological Assessment Report: Ecology Evidence Update

<sup>&</sup>lt;sup>2</sup> Charnwood Borough Council Local Plan 2020-36 (June 2019). Ecological Assessment Report – Appendix 2 Site Assessments



A Construction and Ecology Management Plan (CEMP) document was produced (RSE\_4942\_02\_V2) in order to minimise risks during construction further. A landscape masterplan (Golby + Luck 2021) has also been produced to provide a suitable landscape buffer and range of suitable habitats within the site, such that this scheme has been shown to deliver a net gain for biodiversity, using the DEFRA Metric. Incidentally the use of the DEFRA Metric in Charnwood over the Warwickshire CC Metric, has been clearly set out as an expectation within the introduction and methods sections of the Council's own Ecological Assessment Report (CBC June 2019).

As a conclusion of the above assessment of PSH447 it is considered that the criteria for a D rating do not apply to this site, and that a C rating would be more reflective of the site and its potential for ecological impacts.

The Ecological Assessment report, and Sustainability Appraisal go on to review a nearby but larger site, outside the settlement to the west of Burleigh Wood (PSH133, Land to r/o Snells Nook Lane, Loughborough) as having a biodiversity grading of C. This site is arable but is similar in its proximity to and effects on Burleigh Wood LWS & Ancient Woodland. This site has been given a C rating, and was rated C rather than B, "because it lies immediately adjacent to an area of ancient woodland and may require additional buffering". This is precisely the same situation as PSH447. The only difference is habitats on site are poor semi-improved grassland over the arable land of PSH133.

As there is a degree of difference of opinion over the quality of this grassland within PSH447, and the recent addendum report (May 2021) which throws up the possibility of there being acid grassland indicator species on this site, we recommend that any subsequent planning application for this site be informed by a National Vegetation Classification survey, and that a minimum 20 quadrat samples be taken to comprehensively understand the composition, structure and management of grassland on this site. This will also locate acid grassland indicator species and provide avoidance, mitigation, compensation and enhancement measures for them, as appropriate. In principle we would seek to retain them and provide enhancement recommendations to be incorporated into the landscape masterplan for the scheme.

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,

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For and on behalf of RammSanderson Ecology Ltd.

Enclosures: n/a