

**TOWN & COUNTRY PLANNING ACT 1990
SECTION 78 APPEAL**

**APPEAL BY GREAT LAKES UK LTD
REF: APP/C3105/W/20/3259189**

**LAND TO THE EAST OF M40 AND SOUTH OF A4095,
CHESTERTON, BICESTER, OXFORDSHIRE OX26 1TE**

**REBUTTAL BIODIVERSITY EVIDENCE
OF JAMES PATMORE CEcol CEnv MCIEEM BSc *Hons***



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1.1 Introduction

1.1.1 My name is James Patmore. I am a Chartered Ecologist and Chartered Environmentalist who holds full membership of the Chartered Institute of Ecology and Environmental Management. I am instructed on behalf of the Appellant in relation to biodiversity and ecological matters in respect of this appeal.

1.1.2 I have already provided a main proof of evidence and appendices for this appeal. This rebuttal proof of evidence is submitted following receipt of a proof of evidence from Dominic Woodfield on behalf of "Parishes Against Wolf". To be clear, I do not seek to set out all matters on which I disagree with Mr Woodfield in this document. Many of these will be self-evident from my proof of evidence and I will deal with such issues as are necessary at the inquiry itself. This rebuttal proof of evidence simply deals with certain matters where I consider it may be helpful to the inquiry and save time if I provide a brief response in writing. It is not intended to be exhaustive and the fact that I do not deal with every point raised by Mr Woodfield should certainly not be taken as an indication that I accept any of them. It should be read in conjunction with my existing evidence.

1.1.3 I will therefore attempt to group those areas raised by Mr Woodfield where I consider a written response may be useful in advance of the inquiry itself under general headings below.

1.2 Alleged Lack of Transparency

1.2.1 In section 2 and section 5.1 of his evidence, Mr Woodfield makes various allegations of a lack of transparency in respect of the biodiversity net gain calculations and information submitted by WSP on behalf of the Appellant during the planning application process. I have already identified in my main evidence the principal information that was provided. I consider Mr Woodfield's criticisms are misplaced and unjustified.

1.2.2 First, it will be apparent from the planning application process (described in more detail in my earlier proof of evidence) that the Appellant submitted a biodiversity net gain calculation and then provided further information about those calculations to the Council at their request. As a result

of CDC's ecology officer reviewing that information, CDC's officers were satisfied with the information provided and that the appeal proposals will result in a biodiversity net gain and that it complied with both the relevant CDC development plan policies and the National Planning Policy Framework ("the NPPF"). It is also clear that Natural England had no objection to the appeal proposals. That remains the case. Whilst objectors made various criticisms of the type that Mr Woodfield seeks to make about that information, these were not accepted by CDC and correctly so. WSP provided all necessary information to satisfy CDC and its ecology officers and I do not consider there is any merit in the suggestion of a lack of transparency. Had further information been thought necessary to satisfy CDC and its officers, it would have been requested.

1.2.3 Second, for the purposes of the appeal I have independently reviewed the information that was submitted by WSP as part of the planning application process. Using the same information available to CDC and Mr Woodfield, I have been able to replicate the biodiversity net gain calculations that WSP produced and I have shown these in my evidence. Mr Woodfield's criticisms about any alleged lack of transparency are therefore wrong as I have demonstrated myself.

1.2.4 Third, having now read the evidence from Mr Woodfield it is apparent that his frustrations are of his own making. All the information necessary to understand WSP's calculations was provided to CDC in the planning application process. Mr Woodfield appears not to recognise or acknowledge that the methods section in WSP's BNG Report identifies that WSP followed the Defra Metric (2012) and that WSP used what were then the most recent reference sources which are identified in that Report. Contrary to what Mr Woodfield appears to be claiming, those reference sources provide a robust and refined method, still in use today i.e. GN36 methodology for BREEAM 2018.

1.2.5 Fourth, it appears that Mr Woodfield is not familiar with BREEAM 2018 GN36 methods or reference sources. They are not identified in the body of his proof of evidence, nor cited in his own references. That is despite the fact that this methodology is clearly stated in the WSP BNG Report as being a source of their methodology and the relevant references are given in the

reference list. If Mr Woodfield had referred to those references, a large proportion of his claimed misgivings about the WSP approach and its methodology would have been avoided (in terms of attributes such as distinctiveness and time to target multipliers).

1.2.6 Fifth, I am familiar with these BREEAM methods identified in the WSP information. I have been able to use them to verify the WSP findings and to understand why WSP selected the various habitat attributes, such as distinctiveness and time to target, based on that BREEAM guidance. My own firm carries out such BREEAM calculations. It not difficult to follow the algebra that WSP presented in the detailed tables in the WSP Response to CDC Ecology which follows the original Defra metric method that WSP identified it was using.

1.2.7 I therefore do not agree with Mr Woodfield's claims about a lack of transparency. All of the necessary information to replicate WSP's calculations and to understand them is readily available. Mr Woodfield refers to a request he made to WSP to obtain its own proprietary spreadsheet software but provision of such software is neither necessary nor would I expect a firm to provide free access to its own proprietary spreadsheet software.

1.3 'Shadow' Metric

1.3.1 At paragraph 5.1.2 of his evidence Mr Woodfield refers to having conducted a "shadow" metric calculation using an old 2014 version of the Warwickshire County Council ("WCC") Excel calculator. I have already explained why resorting to a different metric is unnecessary above. But in addition, the 'shadow' metric that Mr Woodfield has presented is not directly comparable to the method that WSP undertook and identified. The metric Mr Woodfield has used is specific to WCC. The habitat values are adjusted specific to that region along and the default time to targets/difficulty vary. There is no justification for using this metric in circumstances where WSP identified the detailed reference source associated with the BREEAM 2018 methodology. The data table in BREEAM Appendix C accords with the attributes selected by WSP in their calculation as per the comparison tables set out in my Proof of Evidence (Table 3.5 to 3.6 and Table 5.1 to Table 5.2).

1.3.2 In any event, Mr Woodfield fails to recognise that having used the WCC metric, he has in fact actually achieved a similar score to WSP in the results he has presented in DW4 if one compares the information correctly. What he has failed to recognise is the need to adjust the score in DW4 to compare against the total % gain method that Defra Metric presents in the WSP Report. Mr Woodfield has failed to recognise that the WWC metric he has used adds things up slightly differently.

1.3.3 Thus, for example his WCC metric score in DW4 in fact shows a score of approximately +25% in terms of biodiversity net gain, when using the information in the following figures taken from his own spreadsheet. I can illustrate this as follows –

Baseline pre-development units – 55.86

Post development unit – 69.74 (from 29.71, created, 19.27 enhanced and 19.98 retained)

So % change of DW4 is;

$69.74 - 55.86 = (13.88 \text{ units}) / 55.86 = 24.85\% \text{ gain}$

1.3.4 The +19.90 unit figure in DW4 comes as a measure of the difference between the impact score and the created/enhanced units i.e. from his own numbers, that is: 29.08 (baseline) - 48.98 (sum of creation/enhancement). The WCC metric removes the retained habitat, with no change score from both sides of equation, so providing a different gain output as compared with the Defra 2012/Biodiversity Metric 2.0.

1.3.5 Accordingly, leaving aside that it is both unnecessary and inappropriate to have used the WCC metric, the reality is that Mr Woodfield has in fact arrived at a similar calculation under WCC metric as that shown by WSP in its metric, with similar overall created/enhanced retained habitat scores to WSP. The problem is that he has not realised that.

1.3.6 So even if one uses the WCCC metric that Mr Woodfield has prepared in DW4, the appeal scheme achieves approximately 25% net gain on the 55.86 units existing on site presently, or (as his numbers show) an approximate 68% increase on the directly affected areas.

1.4 Running the shadow calculation with reinstated defaults

- 1.4.1 In section 5.2 of his evidence, Mr Woodfield embarks upon an exercise of re-running his “shadow” calculation with what he describes as “reinstated” defaults, but in so doing he has misunderstood and misused the metric methodology.
- 1.4.2 As I have pointed out above, WSP methodology is based upon an extensive supporting data set (see GN36 Appendix C – Core document CD10-15). It is therefore both a redundant exercise and an inappropriate one to carry out what Mr Woodfield has done in DW5 (in addition to the problems I have identified above). In DW5 Mr Woodfield has changed the approach to distinctiveness, despite the extensive supporting data and GN36 for the distinctiveness that applies to the Defra 2012 metric that WSP has used. He also purported to change conditions on the basis that he is reinstating defaults, but this demonstrates a misunderstanding on his part. Conditions under the Defra 2012 metric are not set to defaults. They are edited by the assessing ecologist.
- 1.4.3 Consequently, the exercise Mr Woodfield has purported to undertake in DW5 is a meaningless and unjustified one and cannot be compared to the WSP figures and calculations in the way he appears to suggest.
- 1.4.4 In addition, the metric he has presented in DW5 also has clear ‘error’ messages, showing that there are incomplete fields/imbances which brings into question any reliability of the current headline figures quoted by Mr Woodfield in any event.
- 1.4.5 In DW5 Mr Woodfield has also sought to raise queries in relation to times to target and difficulty, but those used by WSP are informed by GN36 Appendix C – Core document CD10-15, as evidenced in my proof of evidence.
- 1.4.6 Notwithstanding all that, it can be noted that even with Mr Woodfield’s adjusted metric (having changed the attributes of the actual baseline conditions of the site in ways which are simply inappropriate and unjustified and with the inclusion of errors), Mr Woodfield is still presenting a net gain score for the appeal proposal of +7%, as summarised below –

Baseline pre-development units – 56.38

Post development unit – 60.33 (from 21.61, created, 18.74 enhanced and 19.98 retained)

So % change from Mr Woodfield's DW4 would be;

$60.33 - 56.38 = (3.95 \text{ units}) / 56.38 = 7\% \text{ gain}$

1.5 Alleged errors in baseline habitat classification and measurement

- 1.5.1 In section 5.3 of his evidence Mr Woodfield claims that there are errors or unjustified inputs into the WSP metric calculations in relation to the baseline. I strongly disagree and do not consider that Mr Woodfield has a proper basis for making such claims.
- 1.5.2 While I and Mr Woodfield have visited the Site, the timings of our visit in December and January 2020 are both outside the optimal time for habitat surveys. The aim of my verification visit (fully documented with supporting photographs) was to assess the core habitats present and to check the baseline mapping extents used in the WSP BNG baseline maps. During my visit I covered the entire Application Site. Mr Woodfield describes a short visit, but he does not provide any supporting evidence, photographs plans or locations of the areas of interest he highlights in his evidence.
- 1.5.3 Based on my own site visit and review of all the supporting information (including in particular the habitat surveys that were previously conducted) I am entirely satisfied that the amenity grassland for the site has been appropriately mapped. In the winter period as confirmed by my site visit, the entire area of amenity grassland is subject to intensive mowing with large areas of short, managed grassland dominating the Site. There are only small areas of interest on banks/edges, but not to the extent that materially changes the approach to the habitat assigned in the metric, let alone warranting the extent of change that Mr Woodfield now appears to champion. I will return to the issue of the habitat surveys in a moment.
- 1.5.4 Mr Woodfield has sought to identify what he considers to be patches of interest within the amenity grassland and on that basis has claimed that the value of the baseline should be increased. This approach is misconceived for a number of reasons. First, it not based on any detailed floristic

assessment or survey of the site. Indeed, he concedes himself that he has increased the area based on extents of old aerial photography. This is not a proper basis for doing so. In fact the series of photographs from my own site visit show how little difference there is between the 'rough' areas identified by Mr Woodfield and green/short/fairway areas in terms of grassland type/structure.

1.5.5 Second, Mr Woodfield's approach is particularly inappropriate given that there is a series of surveys supporting the planning application. The assignment of habitat type is based on those surveys and correctly identify a large expanse of managed amenity grassland with occasional patches of interest. It has been assessed appropriately in terms of biodiversity value. This is not just my opinion based on my own site visit, but the other ecological assessment by two other firms (WSP and an independent surveyor).

1.5.6 The following baseline reports assess and identify the value of the grassland

- Preliminary Ecological Appraisal November 2019 WSP – the final updated version of the PEA presented as Appendix 9.1 includes the following –

- Para 3.3.2 –

As the original Phase 1 habitat survey was undertaken outside of the optimal survey season for botanical identification, an additional botanical walkover was undertaken in the summer of 2019 during the flowering period. The update botanical site visit was made on the 24th August 2018 by a competent botanist who is a Full member of the Chartered Institute of Ecology and Environmental Management. Weather in warm and sunny conditions in August 2018. Those habitats within the Site which could have been misclassified during the January survey were revisited. These comprise areas of less managed grassland that were classified as semi-improved grassland: PBW/SI(P)1, PBW/SI(P)2 and SNG 4 in WSP 2018. A species list was collated within each of these parcels with species cover estimated using the DAFOR scale.

- *It was not deemed necessary to revisit amenity grasslands and plantation woodlands for which sufficient data is presented in WSP (2018) to enable habitat evaluation.*
- An Invertebrate habitat assessment and hairstreak butterfly survey (2019) undertaken by WSP drew the following conclusions –
 - Similarly describes the Site as generally dominated by amenity grassland, not considered to be ‘important’ for invertebrates.
 - Indeed, based on the survey plan only one area important for invertebrates was present in the application area, Area 6 which is the northern portion of the Site.
 - The methodology confirms that the assessment was concerned with identifying ‘species-rich grassland’ with a high proportion of plant providing nectar and pollen and varied vegetation structure. No such areas were identified in the areas of amenity grassland indicating that no species-rich areas were present.
- A follow up invertebrate habitat assessment undertaken by an independent surveyor (Jones, 2018/2019) as presented in Appendix 9.9ii of the ES concludes the following with regard to habitats –
 - *Mown lawns, whether in domestic gardens, playing fields, or golf course fairways, are notoriously low in biodiversity. It is in the surrounding rough edges that wildlife lurks, and it was in these rough edges that this current invertebrate survey concentrated.*
 - *Most species found were common ones – those that could occur on almost any piece of open Land in England. The habitats available – rough grassland, scrub, young woodland small ponds – are all part of a relatively recently landscaped environment, and although some unusual and scarce species occurred, it does not seem that the site has had much time to mature and acquire complex*

communities of more varied and unusual insects. Where these habitats abutted the open golf course, they were rather severely managed with close mown grass hard up against the hedges, grass cuttings dumped around trees and pond-side vegetation trimmed back severely.

- *The invertebrate habitats on Bicester Golf Course are relatively limited – rough flowery grassland, scrub, marginal trees, small ponds. These are all fairly recent habitat and have had only limited time to develop complex flora and fauna. Where these adjoin the fairways they are unsympathetically managed for wildlife. A limited number of unusual invertebrates found during September visits indicates that these semi-natural habitats have some value for invertebrate biodiversity, with several scarce or interesting species found.*

1.5.7 Mr Woodfield's approach is therefore contradicted by the evidence.

1.5.8 Mr Woodfield makes reference to the classification of amenity grassland involving golf courses; but what JNCC (2010) actually states is "if the amenity grassland has a sward-rich in herbs, it may be possible to classify it as semi-improved grassland." Based on my own inspection of the Site, but also the WSP/BSG assessment of habitat types, I do not consider there to be any basis for suggesting that the amenity grassland is a sward rich in herbs. As one would expect, there are instances of locally abundant herbs within the area (to which Mr Woodfield refers), but not at either a level or mixture that would warrant a description of a sward rich in herbs, or reclassification of what is demonstrably a well-managed, but consequently regularly mown golf course (as illustrated by various photographs in the application documents and also my own site visit). Further photographs are appended to this rebuttal (Appendix A) to demonstrate areas under regularly management (including greens, fairway and the edge 'rough') which are subject to year round management (cutting/trimming etc) and herbicide/fertiliser applications (Pers Comms – Graham Payne, Bicester Golf Course Managing Director). It is understood that the 'rough' areas adjacent to greens/fairways is maintained short over the summer months to aid players to locate their golf balls and to ensure the speed of the games is not hindered. The

rougher areas of grassland beyond the managed 'rough' are areas that are not regularly managed and consist of the rough grass/scattered trees that have been distinguished between the playing areas in the WSP baseline mapping. A range of winter/summer (Jan/May) comparison photographs are also provided to further illustrates that areas of managed 'rough' does not support a range of flowering plants/tall grass over the summer.

1.5.9 Notwithstanding all this, in section 5.3.3 of his evidence Mr Woodfield goes on to introduce another so-called 'shadow' metric in DW8 based on his claimed reclassification exercise which I consider to be unfounded. This of itself renders it a flawed document. But there are various other basic problems with it. Again, the metric has 'Error' messages showing in it, indicating incomplete/erroneous fields and imbalances. He states that for this metric he 'splits the quantum equally' of the areas of his two 'splits' (between rough and fairways) in retained habitat, but actually this has not been done in the metric. This results in a large area of what Mr Woodfield measures as being of higher value "rough" being shown as lost to development, so increasing the impact score, but with no benefit of an equal and equivalent area being shown as retained/enhancement habitat in the restoration section of the metric. This obviously distorts the results (even if there were any proper evidential basis for his reclassification which there is not). In addition, from measures I have taken from google earth, the split between the roughs (only evident in summer imagery as the areas are mown in the winter) and the greens/fairways appears greater in extent than the 4.06ha stated in Mr Woodfields report, measuring approximately 5.5 ha.

1.5.10 Once again, it is difficult to directly compare this metric with the original WSP measures for the all the reasons I have identified above. What is clear to me is that the amenity grassland areas in WSP metric were appropriately assessed/mapped and those rough areas that are subject to limited management are accounted for in the WSP numbers and calculations with regard to the semi-improved grassland and poor semi-improved grassland areas.

1.5.11 At various points, Mr Woodfield refers to additional species he has observed, but he provides no photographic evidence, nor locations nor indication of abundance.

1.5.12 Based on what I have seen at the Site, the WSP findings set out in the Preliminary Ecological Appraisal (and additional botanical survey) and also other sources of information such as the findings of the invertebrate surveys, the overall habitat classification as amenity grassland is sound. Mr Woodfield is over valuing the habitats present in his metric updates. A further example of the of this is his attempt to value the scattered trees on the site by assigning them to one of the highest distinctiveness habitat types for all tree groups which is clearly inappropriate for the Site features/conditions.

1.6 Tempering exaggerated claims for retained or new habitats

1.6.1 In section 5.4 of his evidence Mr Woodfield makes various assertions that there are exaggerated or overly ambitious claims made about the habitats to be retained, enhanced or newly created. Again, I do not consider there to be any justification for Mr Woodfield's assertions.

1.6.2 The creation/enhancement targets are all soundly based on the supporting evidence set out in GN36 Appendix C guidance along with sound professional judgement. These have established the proposed habitat management requirements set out in the HMMP which clearly go above and well beyond a 'standard' golf course management plan. For example, on Page 9 of the HMMP detailed creation methods and management methods are set out, including the steps to be taken to create appropriate conditions such as measures to reduce soil fertility during creation/enhancement, variance of cutting regimes and specific features for grass snake, all of these would be a substantial improvement on the current site conditions in my view.

1.6.3 At paragraph 5.4.2 he refers to the marshy grassland. The HMMP (CD2-2) for the Scheme details how that marshy grassland would be created. The scheme includes swale areas and proposed marshy grassland enhancements to pond edges and other suitable locations which are appropriate and associated with either existing features or features to be created/modified e.g. existing pond edges, new swale features. The detail of its creation would be provided through condition of planning based on final swale designs and landscape proposals which would be determine through final detailed drainage and water management requirements. .

- 1.6.4 In paragraph 5.4.2 he refers to the successful creation of medium distinctiveness and good condition of semi-improved grassland around the proposed car park and main hotel frontage and under the waterslide infrastructure. These areas are created habitat features and as such are to be set within new landscaped areas with appropriate management and access control to be agreed through detailed proposals. There are areas of amenity grass also set within these areas that would aim to accommodate amenity use of grasslands in this area, for example amenity grassland adjacent to pathways to the north-west of the building.
- 1.6.5 In the same paragraph he refers to claimed 'double counting', but this was an issue that was raised and addressed in the WSP BNG Report which confirms that there is no such double counting and identifies which areas are excluded from the metric.
- 1.6.6 In paragraph 5.4.3 he questions the ability to enhance areas from an existing poor baseline condition to a good condition within 6-10 years. It should be noted that the enhancement difficulty and timeframes selected by WSP follow recognised guidance notes (BREEAM 2018, GN36 Appendix C) with guidance often referring to the professional judgement of the ecologist. WSP have selected similar time frames to creation (e.g. 10 years for grassland enhancements) which provides an extended period to increase the value of an existing habitat. Although the selected WSP multiplier states 6-10 years, with regard to the actual multiplier used in their metric (as evidenced in my Appendix H), the ten-year multiplier is used i.e. 0.71. so a 10 year period has been selected.
- 1.6.7 Accordingly, I strongly disagree with the claims that there is any over- ambitious or unrealistic assessment of what can and will be achieved on the Site under the appeal proposals.

1.7 Outputs from use of the 'Defra 2.0 Metric'

- 1.7.1 At section 5.5 of his proof of evidence, Mr Woodfield refers to the "Defra 2.0 metric." The metric should be referred to as The Biodiversity Metric 2.0. Mr Woodfield suggests that this should have been used in the first instance.

- 1.7.2 My main proof of evidence explains why WSP would have used the metric it did. WSP utilised a recognised method at the time of assessment. This was accepted by CDC with no request for an alternative metric to be used. The use of the Biodiversity Metric 2.0 is therefore not necessary or required in this instance.
- 1.7.3 Notwithstanding all this, Appendix H of main proof of evidence provides a calculation using the Biodiversity Metric 2.0 using the WSP habitat assessment/attributes based on their extensive baseline collation, as verified and accepted by CDC at this stage. It also shows a significant biodiversity net gain.
- 1.7.4 By contrast, Mr Woodfield's attempt to use this metric is based on different inputs to those which have been accepted by CDC and which are supported by the evidence. Mr Woodfield has fundamentally altered the baseline as well as the creation/enhancement outputs based on his unfounded assertions to the effect that all of the extensive baseline works done by WSP are not fit for purpose when that is clearly not the case.
- 1.7.5 As such, his two purported Biodiversity 2.0 metric examples are meaningless as they do not reflect this site or what is proposed. They are based on a range of % losses that deviate significantly from what has been proposed and accepted by CDC as the baseline for the site and appropriate future habitats and management.
- 1.7.6 My Appendix H 2.0 metric calculations provides a realistic balance of the pre/post development position that is properly informed by the accepted baseline/proposed habitat documents that have been considered and accepted by CDC.
- 1.7.7 Moreover, Mr Woodfield claims that his Appendix DW9 presents a % net loss calculation before any adjustments for what he claims to be errors in baseline habitat classification have been set. That is not the case. In preparing his version of the 2.0 metric, he has already altered both pre and post development habitats as compared with the WSP datasets and the site conditions and proposed habitats. Most significantly (and without justification) –

- Pre Development –

- He has set all scattered trees as a 'high' distinctiveness wood pasture and parkland habitat. As illustrated in my Appendix B these trees plainly do not meet such criteria. Many are groups of conifers and others are single age/single species tree groups not supporting the specific criteria for the priority habitat type stated. This distortion immediately elevates the baseline value artificially (overall my Appendix H is comparable to DW10), but this acts to compound his claimed greatly reduced enhancement benefit because of the exaggerated baseline. What he is showing is unrealistic and not a comparable or realistic metric to those with the WSPs attributes, nor mine set out in my Appendix H.
- I append photographs (Appendix H) of tree groups to illustrate this point to show single species/same age groups with managed grass beneath, in no way qualifying as wood pasture and parkland habitat
- Post Development –
 - Whilst the creation scores used by Mr Woodfield in his DW10 and my Appendix H are similar, the enhancement scores Mr Woodfield uses are greatly reduced and artificial as Mr Woodfield has wrongly adjusted/not selected appropriate habitats, -
 - Mr Woodfield has selected 'modified grassland' which is of low distinctiveness, rather than 'grassland other neutral' as set out in my metric which is the target habitat for creation as per the scheme proposals. This results in showing 9 units in DW10 as compared to some 20 units in my Appendix H which is the correct and realistic result based on the scheme proposals.
 - His calculations show losses due to differences he attributes to scattered tree/woodland which are not justified.
 - His change of approach to grassland is significant and deviates from the way in which the original WSP figures are correctly derived.
 - The above is the source of Mr Woodfields purported net loss

1.7.8 Not content with this flawed approach, Mr Woodfield then takes what he has wrongly assumed in DW9, and then further deviates away from the baseline/proposed habitat position for the appeal scheme and makes additional changes other than the split he has ascribed between the

grassland areas. It is not possible to review this presented metric properly, or to use it in direct comparison to the correctly calculated metrics I have presented, as the elevated baseline score he uses, and therefore the consequential reported % loss, is derived from a basic error in the calculations presented by Mr Woodfield.

- 1.7.9 The pre development area he has used in this calculation is set at 22.45 ha rather than 18.39 ha. The amenity grassland split he has made has not been deducted from Row 12 in spreadsheet A1 – Site Habitat Baseline. This therefore results in an overvalue of the baseline, so again exacerbating the net loss that Mr Woodfield is purporting to show in this table.
- 1.7.10 Table A-2 Site Habitat Creation in DW10 clearly shows an error message in red which should have alerted Mr Woodfield to check his calculations.
- 1.7.11 For this reason alone, this presented % loss is not accurate, and it is fundamentally over-inflated due to this error, making direct comparisons with my Appendix H difficult.
- 1.7.12 In addition, in Table A3 Site Habitat Enhancements – Mr Woodfield has the correct proposed habitat at Row 12 ‘Grassland – other neutral’, that being the target habitat for the proposals but this is what he should have selected in his DW9 calculations. Row 8 should also be selected to ‘Grassland – other neutral’. The error also results in the resulting enhancement units he is showing as being artificially much reduced.
- 1.7.13 As explained above the split in amenity grassland condition that is proposed by Mr Woodfield in his metric are wrong. Contrary to what he asserts, the grassland meets the criterion of poor condition based on the Appendix B criteria that I have reviewed previously. Moreover, the amenity grassland meets the ‘poor’ condition set out in the 2.0 technical supplement for grassland.
- 1.7.14 It is clear from all baseline information collated to date and also the site photographs in those documents and appended to this rebuttal, that the area is an intensively managed amenity grassland, managed as a golf course.

1.8 Additional Net Gain

1.8.1 In light of the issues raised Mr Woodfield's proof it should also be recognised, as identified in my own proof of evidence, that there are additional net gains available for the Site including creation and enhancement opportunities that are yet to be accounted for anyway.

1.8.2 By way of illustration, I have updated and appended (see Appendix B) my 2.0 Metric presented in my own Proof of Evidence (Appendix H) with potential enhancements that could be included in the next iteration of the metric (these would be subject to detailed review/measures based on the final detailed landscape schemes as a discharge of condition) in order to demonstrate that a number of additional biodiversity units are available within the scheme design and are yet to be fully accounted for at this stage of the Proposed Development.

1.8.3 In summary, as illustrated on the appended update to my Appendix H Biodiversity Metric 2.0 -

- Creation
 - With regard to creation, as per tab A2 - Site Habitat Creation an area of green roof covering approximately 0.3 ha has been illustrated here as a habitat creation feature (as shown on the illustrative masterplan for the Proposed Development), providing +1.59 units based on a more diverse/large scale green roof that could be created in the area allocated.
- Enhancement
 - With regard to enhancement as indicated on the WSP Response to CDC Comments there are in the region of 4.28 ha of habitat subject to no current enhancement proposals. If additional gains were to be required at the detailed implementation of the Proposed Development, the following additional enhancements could be readily implemented, as illustrated on tab A3 – Site Habitat Enhancement -
 - Row 1; Additional 0.32 of broad-leaved plantation enhanced from poor to good condition with a +2.21 biodiversity unit gain
 - Row 2; Additional 0.78 ha of Mixed plantation enhanced from poor to good condition with +5.39 biodiversity unit gain

- Row 3; Additional 0.39 ha of scattered trees enhanced to either good condition or broad-leaved woodland type habitat of good condition scattered tree (depending on final detailed landscape proposals) with a +2.69 biodiversity unit gain.
- Row 7 – As detailed in the Environmental Statement (Biodiversity Chapter) para 9.5.8 the seven existing ponds will be subject to enhancements. This is currently not accounted for in the WSP metric, as such the enhancement of moderate condition ponds to good condition ponds covering an area of 0.89 ha delivers a +14.71 biodiversity unit net gain.

1.8.4 Although the existing scheme already shows significant biodiversity net gain, it can be seen from these simple illustrations that additional creation and enhancement could readily deliver an additional overall biodiversity unit gain of approximately +8 biodiversity units in total compared to my Appendix H Biodiversity 2.0 metric, equating to a 30% net gain overall.

1.9 Offsite biodiversity opportunities

1.9.1 Although there is no need for any additional benefits to be delivered (given what has already been shown), it can also be noted that other parts of the golf course will continue to be used as a golf course, but based on the proposed redesigns of the golf course presented in Mr John Ashworth's Proof of Evidence (Appendix 1 of that Proof of Evidence), there are many further opportunities for wider biodiversity enhancements to be delivered as part of those proposals. These would also deliver additional gains associated with new habitat features and enhancement of retained habitats.

1.9.2 For example, based on the redesign presented by Mr Howard Swan in Appendix 1 of John Ashworth's Proof of Evidence, a number of biodiversity benefits are very likely to arise, as the proposed enhancements utilise existing managed amenity grassland areas (already subject to intensive management) and not higher value features such as scattered trees and woodland blocks, as well as areas of rougher grassland along the edges of the existing golf course. That applies to any enhancements to the driving range area as well. There is the opportunity to deliver

additional biodiversity gains in these proposals, whether it be from additional tree planting or enhancements of habitats (including aquatic, semi-aquatic, wetland areas and tree/woodland areas) and further environmental management stewardship. None of this is required (given what has been identified for the Appeal Proposals) but it illustrates the extent of the opportunities that exist to deliver biodiversity benefits as a result of the Appeal Proposals.

1.10 Conclusion

- 1.10.1 In conclusion I have set out a series of key points of disagreement above and highlighted where information provided by Mr Woodfield with regard to his shadow metrics are departing greatly from the actual baseline of the appeal site and the correct attributes previously selected by WSP. This renders direct comparisons of the various 'shadow' metrics he has presented (notwithstanding the errors identified) difficult to the submitted WSP Biodiversity Net Gain and my comparison 2.0 metric.
- 1.10.2 The application was supported by an appropriate Biodiversity Net Gain calculation based on the Defra methodology (in accordance to relevant policy) which demonstrates that a net gain would be achieved by the Scheme. I have verified those methods and results and provided a comparison metric that continues to demonstrates a significant net gain in biodiversity for the Proposed Development. Additional net gain opportunities are also identified.

APPENDIX A - PHOTOGRAPHS



Photograph 1 – January 2021 – view across managed ‘rough’ to green beyond.



Photograph 2 – January 2021 –managed ‘rough’ and fairway boundary



Photograph 3 – January 2021 – view across managed ‘rough’ to green beyond.



Photograph 4 – January 2021 –managed ‘rough’ against ditch, note managed grass on banks of ditch.



Photograph 5 – January 2021 – regularly managed grass dominated areas, no established grassland habitat.



Photograph 6 – January 2021 single stands of conifer and broad-leaved, similar age and limited structure with managed grass below



Photograph 7 – January 2021 single stands of conifer, similar age and limited structure with managed grass below, note short managed ‘rough’ around playing area on banks.



Photograph 8 – January 2021 single stand of broad-leaved trees, similar age and limited structure with managed grass below



Photograph 9 – January 2021/May 2019 comparison views –southern boundary



Photograph 10 – January 2021/May 2019 comparison views –southern boundary



Photograph 11 – January 2021/May 2019 comparison views –northern boundary

APPENDIX B – PREVIOUS APPENDIX H BIODIVERSITY METRIC 2.0 WITH POTENTIAL FURTHER ENHANCEMENTS INCLUDED