



S78 Appeal reference APP/C3105/W/20/3259189

**Land to the east of M40 and south of
A4095, Chesterton, Bicester, Oxon**

SUMMARY

PROOF OF EVIDENCE

of

DOMINIC WOODFIELD CEcol CEnv MCIEEM

on behalf of

'PARISHES AGAINST WOLF'

BIODIVERSITY AND RELATED POLICY MATTERS



Town and Country Planning Act 1990 (as amended)

Section 78 Appeal

PINS reference APP/C3105/W/20/3259189

(Cherwell District Council References: 19/02550/F & 20/00030/REF)

by

Great Lakes UK Limited

Land to the east of M40 and south of A4095, Chesterton, Bicester, Oxon

SUMMARY

PROOF OF EVIDENCE

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DOMINIC WOODFIELD

BIODIVERSITY AND RELATED POLICY MATTERS

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1 Qualifications and scope of evidence

- 1.1 My name is Dominic Woodfield. I am a professional ecologist and environmental planning consultant and Managing Director of Bioscan (UK) Limited, a leading ecological consultancy. I am a Chartered Ecologist (CEcol), Chartered Environmentalist (CEnv) and a full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). A more complete summary of my experience and qualifications is given in my main proof.
- 1.2 My evidence to this inquiry is narrowly circumscribed around the question of whether the Appeal Proposals would avoid overall net harm to biodiversity (in line with the requirements of national planning policy) and secure net gain (as required for compliance with adopted Cherwell District Local Plan policy ESD10 and related Cherwell District Council resolutions). Although I have noted less than best practice approaches in other areas (such as with some of the baseline protected species surveys), I have not engaged in any detail with such matters at this stage.

2 The Appellant's claim of biodiversity net gain

- 2.1 The Appellant relies on the output from application of a superseded version of the Defra biodiversity metric to support its claim that the Appeal Proposals will deliver 'biodiversity net gain' (BNG). Despite requests, they have however not to date to provide a full copy of these calculations in accordance with best practice and the interests of transparency.
- 2.2 I present in my evidence a 'shadow' calculation performed in lieu of being able to interrogate the Appellant's calculations. I discuss how this reveals a number of discrepancies, misclassifications and unexplained changes to the methodology and how when these are corrected, the Appellant's own methodology actually indicates a result of biodiversity net loss.
- 2.3 I also present the results of running the same input parameters through a more up to date version of the Defra metric, and which also indicates a result of net loss of biodiversity.

3 Conclusions

- 3.1 It is remarkable in the first instance that an appellant as well resourced as this has not provided a biodiversity net gain assessment in conformity with up to date Defra



methodology and prevailing best practice. My evidence demonstrates that the Appellant's biodiversity net gain assessment is in any event skewed by a number of factors. These include cursory and simplistic classification and undervaluing of the baseline habitat quality and condition, coupled with technically deficient application of an outdated methodology for calculating net loss or gain. Further bias is then introduced via highly optimistic to the point of unrealistic assumptions as to the future quality and value of retained and newly created habitats, without meaningful regard to practical matters of achievability and deliverability.

- 3.2 Whether one seeks to correct these oversights within the framework of standard ecological assessment processes, by means of the Appellant's preferred biodiversity metric methodology, or by testing the appeal proposals through a more appropriate up to date metric, the result is the same. All approaches indicate that the Appeal proposals will, in direct contradiction of the Appellant's claims, deliver net loss of biodiversity if a more robust approach is taken to applying the metrics. This means the Appeal Proposals do not comply with applicable policy at national or local level. This is a matter of clear relevance in the determination of this appeal.



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