



**LAND BETWEEN BURTONS LANE AND
LODGE LANE, LITTLE CHALFONT**

Planning Reference: PL/21/4632/OA

REVIEW OF SUBMITTED ADDENDUM
ECOLOGICAL INFORMATION

March 2022

E2096R2/V1



COMMISSIONED BY:

Little Chalfont Community Association and
Little Chalfont Parish Council

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LITTLE CHALFONT
BUCKINGHAMSHIRE**

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(as uploaded to Buckinghamshire Council's planning portal on the 8th and 9th February 2022)

March 2022

Bioscan Report No.
E2096R2/V1

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1 INTRODUCTION

1.1 Background

1.1.1 In October 2021, Bioscan (UK) Ltd was appointed by Mr Michael Parker on behalf of Little Chalfont Community Association and Little Chalfont Parish Council, to provide an independent review of the ecological information submitted to Buckinghamshire Council (Chiltern Area) in support of outline planning application PL/21/4632/OA, for land between Lodge Lane and Burtons Lane, in Little Chalfont, Buckinghamshire, HP8 4AJ. The findings of this review were presented within a report¹ (dated January 2022), and were included in a package of documents submitted to Buckinghamshire Council by Little Chalfont Community Association and Little Chalfont Parish Council². The Bioscan report concluded that:

“...the ecological reports submitted may not accurately represent the ecological interest present on the application site and it is advised that extreme caution is applied in using it to inform decision making. The safeguards and mitigation proposals offered in the report are founded on an incomplete understanding and/or conveyance of the baseline position and cannot therefore be relied upon by decision makers as a means to avoid significant net loss of biodiversity. This is in contradiction to national and local planning policy. It is recommended that clarity be sought from the Applicant, including justification for deviations from industry standard survey methodologies, to enable a more robust impact assessment to be conducted.”

1.1.2 On the 25th January 2022, Buckinghamshire Council’s ecology officer provided a consultation response to the planning application, and summarised their response as follows:

“I have reviewed the [...] application regarding its ecological implications and we would recommend refusal owing to the biodiversity loss resulting from this development and the impacts of the development of County value habitats (ancient woodland and ‘Important’ hedgerow), County value species (barbastelle) and on other protected species”.

1.1.3 Buckinghamshire Council’s ecology officer goes on to state:

“Objection. From the information provided it is recommended that the application is refused or deferred at this stage due to the impacts on biodiversity, being contrary to NPPF and ODPM Circular 06/2005.”

1.1.4 In early February 2022, the Applicant provided additional submission documents as an addendum to the original planning application. It is understood that this addendum information was required due to minor changes to the application boundary arising from proposed highway improvements works in two locations: 1) along Lodge Lane and Church Grove; and 2) between Oakington Avenue and Amersham Road. As this modification to the application boundary occurred after the production of the original planning application documents (in November 2021), further assessments were subsequently undertaken to accommodate the latest changes to the application boundary (with these addendum documents uploaded to Buckinghamshire’s Council’s planning portal on the 8th and 9th of February 2022).

1.1.5 In February 2022, Bioscan (UK) Ltd was re-appointed by Mr Michael Parker on behalf of Little Chalfont Community Association and Little Chalfont Parish Council to review the submitted addendum ecology information.

¹ Bioscan (UK) Ltd (January 2022). Land at Former Little Chalfont Golf Course, Buckinghamshire: Review of Submitted Ecological Information (Report reference E2096R1/V1)

² Uploaded to Buckinghamshire Council’s planning portal on the 19th January 2022.

1.2 Site context

- 1.2.1 The application site (with recent addendum modifications) is approximately 30ha in size, and is dominated by a former golf course. The central grid reference is TQ000972. Figure 1 below provides an extract of a plan provided with the planning application identifying the application boundary (red line).

Figure 1. Application boundary (as provided with the planning application).



1.3 Submitted information

- 1.3.1 The submitted addendum documents relating to ecology comprise the following:
- **Environmental Statement Addendum** (Waterman I&E, February 2022)
 - **Appendix 12.2A** - Preliminary Ecological Appraisal: Technical Note update (combining findings from June 2021 and January 2022) (Waterman I&E, February 2022)
 - **Appendix 12.3A** - Biodiversity Net Gain Assessment (Waterman I&E, 2022)
- 1.3.2 As per Bioscan's January 2022 review, the veracity of the above reports, and the robustness of the data and suitability of the surveys undertaken, have been the focus of this review. Conclusions are offered on whether the submitted addendum ecological information provides an adequate level of detail on ecological matters sufficient for the Local Planning Authority (LPA) to discharge its duties to have regard to all relevant material considerations, and its statutory duties in relation to protected and 'Priority' habitats and species.



2 METHODOLOGY

2.1 Review of submitted documents

- 2.1.1 The relevant addendum documents submitted with the planning application (as listed above in paragraph 1.3.1) were given a 'high-level' review by Bioscan.
- 2.1.2 The ecology reports were reviewed and assessed for their adequacy, including in respect of any limitations to the survey methodology, the validity of the stated results, and robustness of the related assessments. This is set out at Chapter 3 of this report (below).
- 2.1.3 Statutory consultees' comments on the submission documents (including specifically those from Buckinghamshire Council's ecologist) were also reviewed where relevant to do so.

3 CRITIQUE/COMMENTS ON THE ADDENDUM ECOLOGY REPORTING

3.1 Document review process

- 3.1.1 The following provides a list of the reports that have been subject to review, and identifies where they appear to fall short of accepted industry-standards or where additional information is likely to be required in order for the LPA to come to an informed planning decision.
- 3.1.2 It should be noted that the issues and shortfalls in the survey methods, and the subsequent assessments of the ecology reports submitted originally, as highlighted in the January 2022 Bioscan report (E2096R1/V1), and by Buckinghamshire Council's ecology officer³, do not appear to have been addressed by the Applicant in their addendum reports.
- 3.1.3 For brevity, this section does not repeat the comments made in the previous Bioscan report, but they should nevertheless be read in tandem, with the Applicant still needing to address the identified significant shortfalls before a robust planning decision can be made by the LPA.

3.2 Environmental Statement Addendum (Waterman I&E, February 2022)

- 1) Table 12.1: It is noted that Table 12.1 only relates to Buckinghamshire Council's ecology scoping response (dated 26th August 2021) and does not address the significant shortfalls in the reporting, methodologies and subsequent assessments as outlined by Buckinghamshire Council's ecology officer and those outlined in Bioscan's January 2022 report. Nevertheless, the following highlights some points that should be addressed or clarified by the Applicant:
 - i) Bats. The report states in Table 12.1: *"Bat activity surveys were completed in 2019 and 2021 (Appendix 12.16 and 12.17, ES Volume 3 of the November 2021 ES). These surveys were completed in accordance with current best practice which took account of the assessment that the site supports moderate potential habitat for foraging and commuting bats."* As stated within Bioscan's January 2022 report, the surveys undertaken fell short of best practice set out within the Bat Conservation Trust's (BCT) Survey Guidelines (2016)⁴ due to *inter alia*: a) the level of survey work undertaken for a site considered by the Applicant to be of high value for foraging and commuting bats; b) the early curtailment of each survey visit; and c) the lack of a pre-dawn survey.
 - ii) Lighting. Further information (such as additional surveys for rarer bats, and an indicative lighting strategy) is required regarding the impacts of lighting on bats, particularly due to the presence of species such as barbastelle.
 - iii) Invertebrates. Whilst the scoping opinion stated: *"Invertebrate survey work should be considered and contribute to the retention and enhancement of the B-lines network"*, the Applicant has failed to state how the B-Lines network has been addressed or considered in the ES.
- 2) Section 12.2.1. The second paragraph in this statement states: *"No access to land containing ponds within 500m has been given to survey the suitability of the ponds for GCN"*. However, two ponds are immediately adjacent to public highways, and could have been assessed for their suitability to support great crested newts by the Applicant. This point is addressed at (4) below.

³ As provided within the ecology officer's response uploaded to the planning portal on the 26th January 2022.

⁴ Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London.

- 3) Section 12.3- Bats. This section states: *“a large Oak tree is located within the Modified Grassland located at the top of Lodge Lane. The tree is in good condition and no visible signs of deterioration during the Survey in 2022. A Preliminary Roost Assessment (PRA) for bats was carried out during the survey with no potential roosting features (PRFs) seen at the time of survey. At the time of writing this report, it is assessed that the tree has a negligible bat roosting potential rating...”*. However, photographs taken of this tree by a local resident, and photographic information available via Google Street View, appear to show that the trunk of the tree is clad in ivy, with possible bat roosting features visible in the canopy. Indeed, the BCT’s Survey Guidelines⁵ states that *“A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential”* would fall into the ‘Low’ bat roost suitability category. On this basis, the “large oak tree” should be considered to fall within the ‘low’ category as a minimum, or within the ‘medium’ category as a precaution.
- This section goes onto state: *“No other habitat within the Site has potential for roosting bats and no trees adjacent to the Site have bat roosting potential (for example, no suitable features including rot holes, limb breaks, crevices). Therefore, the Site is considered to be not Significant for roosting bats.”* This text is misleading. As stated in the bat survey reports submitted with the original application⁶, a number of bat roosts have been noted on the site. Alternatively, the reference to ‘site’ should be changed to the ‘Highways Improvement Works area’.
- Section 12.3 also states: *“All other habitats associated with the Highways Improvements Works are suboptimal for bats. It is possible that bats may use adjacent habitat for commuting and foraging (such as hedgerow and woodland) but these habitats are unlikely to be significantly affected by the works.”* Nevertheless, the ES addendum states (on page 5) that there is a *“loss of 14no. additional trees along the western side of Lodge Lane for the shorth [sic] length of Lodge Lane north of the Chilterns/Metropolitan Railway Line and the junction of Lodge Lane with Church Grove”*. It is considered that the loss of these trees could affect foraging and commuting bats and should be assessed within the ES. Further, this statement does not meet that provided in Table 12.3122 [Note: the formatting of the Applicant’s table numbering appears to be incorrect; this should probably state ‘Table 12.3’], which states: *“Direct effects to bats are not anticipated but Indirect effects to local bat populations and their roosts may occur if there are indirect impacts to foraging and commuting habitats.”*
- 4) Section 12.3- Great Crested Newt. This section states: *“[...] Pond 5 (P5) is located approximately 140m north of the Site within the grounds of the Little Chalfont Primary School. This pond was subject to eDNA sampling in 2021 as part of the November 2021 ES and found GCN to be absent.”* However, the Applicant has failed to acknowledge the limitations to the reliability of this survey data, arising from having undertaken the sampling outside of the eDNA seasonal survey window (which falls between mid-April and June)⁷, and therefore this result cannot and should not be relied upon.
- This section goes onto state: *“No previous surveys or Habitat Suitability Index (HSI) assessments have been carried out on the ponds (apart from eDNA on P5) due to access*

⁵ Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London.

⁶ Including: **Appendix 12.18** - Bat Surveys – Preliminary Bat Roost Assessment (PRA) Report – 13 and 15 Oakington Avenue & Trees Along Lodge Lane (Ridgeway Ecology Ltd, 2021) and **Appendix 12.15** - Bat Surveys – Emergence Surveys on Buildings (report reference ASW/BDBL/065/25/2021) (ASW Ecology Ltd, 2021).

⁷ Biggs, J., Ewald, N., Valentini, A., Gaboriaud, C., Griffiths, R.A., Foster, J., Wilkinson, J., Arnett, A., Williams, P. and Dunn, F. (2014). Analytical and methodological development for improved surveillance of the Great Crested Newt. Appendix 5. Technical advice note for field and laboratory sampling of great crested newt (*Triturus cristatus*) environmental DNA. Freshwater Habitats Trust, Oxford.

restrictions". However, two of the ponds are located immediately adjacent to public highways and would allow for the Applicant to undertake HSI assessments. This was confirmed by a member of the Little Chalfont Community Association who was able to view, and take photographs of, these two waterbodies. The two photographs below show Pond P1 (adjacent to the railway line) and Pond P4 (near the junction of Church Grove and Amersham Road). Based on a review of these photographs, relevant aerial photography, and Ordnance Survey maps, Bioscan undertook desk-based HSI assessments of these two ponds. Although the ideal time of year to be undertaking these assessments is generally during the spring and summer⁸, and it is preferable to view the ponds 'on the ground', the resulting scores nevertheless give an approximate suitability score for these waterbodies to support great crested newts. Entering the various parameters to the HSI 'calculator', and taking a conservative approach to scoring the various indices, the resulting score for P1 was calculated to be 0.55, with P4 returning a result of 0.58. These scores place these two waterbodies within the 'Below average' category for great crested newt suitability. However, as previously stated, the scores are based on conservative parameters being entered, and without the assessor viewing the ponds on the ground, and consequently the score may be higher. Furthermore, it is unclear why the Applicant did not undertake a HSI assessment of the pond that was accessed for the eDNA sampling (P5), especially given the limitations imposed by having undertaken that sampling outside of the optimal season.



Photograph 1: Pond P1 (photograph taken 16/02/2022).

⁸ Various dates are given by a range of publications (e.g. Oldham *et al.* (2000) states 'between May and end of September', and ARG UK (2010) states 'between March and the end of September'), but generally the assessment period falls within the time of year when newts would be in waterbodies.



Photograph 2: Pond P4 (photograph taken 15/02/2022).

- 5) Section 12.3- Reptiles. This section states: *“No records of reptiles were returned from the data search undertaken in 2021, and none were seen during the survey in 2022.”* Reptiles are generally active between March and October⁹, and therefore the likelihood that a reptile would have been encountered during a survey in January is consequently very low. Consequently, this statement either indicates a lack of basic reptile knowledge by the Applicant’s ecologist or it is an attempt to mislead the reader.
- 6) Section 12.5.1. This section states: *“The Development including the Highways Improvements Works are also expected to achieve a Biodiversity Net Gain (BNG) of at least 10%, a requirement of the Environment Act 2021 which will come into force through Regulations expected in late 2023”*. However, as detailed below, it does not appear that the development would achieve biodiversity net gain on the basis of the plans submitted.

3.3 Appendix 12.2A - Preliminary Ecological Appraisal: Technical Note update (combining findings from June 2021 and January 2022) (Waterman I&E, 8th February 2022)

- 1) This report is largely similar to the June 2021 Appendix 12.2. Preliminary Ecological Appraisal (PEA) report, a review of which is set out in the January 2022 Bioscan report (E2096R1/V1). Given that text from the update PEA is used in the ES addendum (with Bioscan providing comments on this above), no further comments are provided on this report at this stage.

3.4 Appendix 12.3A- Biodiversity Net Gain Assessment (Waterman I&E, 2022)

- 1) As per the comments in Bioscan’s January 2022 report, significantly greater clarity and transparency would be afforded to the LPA if the populated Metric 3.0 calculation tool were to be provided in full by the Applicant, along with the existing (baseline) and

⁹ Froglife (1999) Reptile survey: an introduction to planning, conducting and interpreting surveys for snake and lizard conservation. Froglife Advice Sheet 10. Froglife, Halesworth.

proposed geo-referenced plans from which the Applicant's metric is derived. In the absence of this information, the following comments are made in relation to the details provided within (or omitted from) the Applicant's 2022 Biodiversity Net Gain (BNG) report¹⁰.

- 2) In order to verify the Applicant's revised BNG calculation, Bioscan entered the parameters as provided within BNG report into a blank Biodiversity Metric 3.0 spreadsheet. However, despite the same figures being entered, the resulting net % change score did not exactly match that provided within the report. The errors appear to be due to the following:
 - a) within the Applicant's report for habitat creation, an area of 1.55ha is given for the modified grassland; however, the resulting habitat units delivered when entering this figure into the metric is 6.18 units, as opposed to the 6.06 units in the Applicant's report. In order for the metric to provide a figure of 6.06 units, an area of 1.51ha needs to be entered; and
 - b) in the Applicant's report for Hedgerows, the length of H4 is given as 0.136km, and entering the given length to be removed gives a resulting lost unit figure of 1.45, as opposed to the 1.37 stated in the report. In order for the metric to provide 1.37, the length retained should be entered as 0.07km.

Although these apparent errors only marginally produce a different net gain score, it highlights that they could be as yet undiscovered but more significant errors within the Applicant's BNG calculations.

- 3) One such apparent significant error noted by Bioscan was the condition assessment of the baseline modified grassland. On Page 22 of the Applicant's 2022 PEA report (Appendix 12.2A), under the section entitled 'Modified Grassland with Scattered Scrub and Scattered Trees' it states: "*The habitat [modified grassland with scattered scrub and scattered trees] is of low distinctiveness and in moderate condition.*" [our underlining]. However, within the Applicant's BNG report, this habitat is shown as being in 'poor' condition. Based on the text for this habitat within the PEA report, and the condition assessment criteria for a low distinctiveness grassland¹¹, Bioscan would agree with the assessment in the PEA report that the grassland is likely to fall within the 'moderate' condition category.
- 4) As stated in the January 2022 Bioscan report, it is difficult to envisage that the Applicant would be able to deliver the Priority habitat 'Lowland Meadow' on the site (particularly as it is likely to be the main dog-walking area for the residents of the development, with potential impacts arising from *inter alia* nutrient enrichment and trampling). Nevertheless, if the Applicant is persistent in stating that this habitat is achievable on the site then further information should be provided, in particular:
 - a) the previous/current land-use of the proposed meadow;
 - b) the plant species currently present (although the Applicant's soil report does provide some, albeit limited, information "*the [...] field is currently unoccupied and is covered in tall grass*", this is significantly insufficient to understand the current status of this field); and
 - c) the management that is proposed to enable the field to become lowland meadow.
- 5) Further, it is noted that the Applicant has stated that the proposed 'high distinctiveness' Lowland Meadow habitat would be in 'Good' condition. However, a review of the soil phosphorus levels within the relevant field, as shown in the Applicant's soil analysis report¹², would indicate that these levels are too high to warrant a 'Good' score for this habitat. The following table (Figure 2) provides the results of the soil analysis (extract taken from the Applicant's report), with the top row providing a broad copy of the soil

¹⁰ Waterman report reference: WIE15569-101-2-2-3-BNG (dated February 2022)

¹¹ Natural England (July 2021). *Biodiversity Metric 3.0: Auditing and accounting for biodiversity – Technical Supplement*

¹² Waterman Report Reference: WIE15569-112-TN-1-2-1 (dated January 2022)

parameters that are suitable for lowland neutral grassland establishment, as set out in Best Practice Guidance Note 17 (BPG N 17) published by Forest Research¹³.

Figure 2. Copy of Table 3 from the Applicant’s Soil Assessment report (dated January 2022).

Table 3: Analytical Results vs. Ideal Topsoil Characteristics for LNG

Location	pH (pH units)	Available Phosphorus (mg/l)	Organic Matter (%)	Total Nitrogen (%)
BPG N 17 Criteria	5.5-6.5	4-25	2-14	0.2-0.7
SA1	7.05	12.2	4.5	0.34
SA2	6.26	8.9	3.9	0.28
SA3	5.73	32.4	6.0	0.34

The samples were also analysed for available potassium, which is not an analyte detailed within the criteria table set out in BPG N 17 but is mentioned. Test Results are included in Appendix C.

- 6) The main body of the Applicant’s 2022 BNG report states the following in respect of the soil analysis: *“Samples were taken from three different locations [SA1, SA2, SA3 in the table above] within the area of grassland proposed to be enhanced. The findings determined that the majority of topsoil characteristics from the three locations matched or were very close to the soil parameters suitable to create Lowland Meadow habitat and therefore the enhancement is likely to be successful and the meadow thrive in this area”*. However, the Applicant has failed to highlight footnotes that accompany the criteria as provided in the source BPG N 17 document. For reference, Figure 3 below is a copy the relevant table provided within BPG N 17 (with selectively chosen figures from this table used by the Applicant in their Table 3 above).

Figure 3. Copy of Table 3 from BPG N 17¹³.

Parameter	Level
Topsoil depth	200–300 mm
Drainage	Slow
pH	Acid to slightly acid (pH 5.5–6.5)
Available phosphorus ^a	25 mg l ⁻¹ (4–12 mg l ⁻¹)
Organic matter ^b	4% (5–14%)
Total nitrogen ^b	0.2% (0.30–0.70%)

Pertinent to the Applicant’s stated ‘Good’ condition of the proposed lowland meadow (as stated in paragraph 6.4 of the Applicant’s Biodiversity Net Gain Assessment report¹⁴) is footnote ‘a’ adjacent to ‘Available phosphorus’ in the above table (Figure 3). Footnote ‘a’ states: *“Acceptable upper limit [i.e. 25 mg l⁻¹]. A level of available phosphorus of less than 10 mg kg⁻¹ is ideal to maximise floristic diversity within unimproved, semi-natural grassland communities (Marrs and Gough, 1989). While values of 11 to 25 mg kg⁻¹ have potential, expect reduced floral diversity and increased risk of competition from rank and pioneer species.”* The values from the site range from 8.9 mg l⁻¹ to 32.4 mg l⁻¹, and

¹³ Harris, P. Brearley, A. and Doick, K. (2014) Lowland neutral grassland- Creation and management in land regeneration. BPG Note 17. Forest Research.

¹⁴ Waterman report reference: WIE15569-101-2-2-3-BNG (dated February 2022)



therefore it can be expected, based on the figures provided in the footnote, that the proposed Lowland Meadow would certainly not fall within the 'Good' condition category. A realistically achievable proposed habitat and condition for the 'Lowland Meadow' field would instead be (at best) 'Other neutral grassland' in 'Moderate' condition.

- 7) Bioscan re-ran the metric based on this more realistic approach (i.e. changing the 'Poor' habitat condition for the baseline modified grassland to 'Moderate' as per (3) above; changing the proposed 2.7ha of 'lowland meadow' to 'other neutral grassland' as per (7) above; and changing the condition of this habitat from 'Good' to 'Moderate' also as per (7) above). Figure 4 below provides the result of this potentially more realistic approach.

On-site baseline	<i>Habitat units</i>	182.39
	<i>Hedgerow units</i>	11.63
	<i>River units</i>	0.00
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	150.12
	<i>Hedgerow units</i>	14.34
	<i>River units</i>	0.00
On-site net % change <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-17.69%
	<i>Hedgerow units</i>	23.28%
	<i>River units</i>	0.00%

Figure 4. Results of Bioscan re-running of the metric calculation based on more pragmatic and realistic condition parameters.

- 8) Figure 4 above indicates that the likely actual percentage biodiversity net change on the site is (at best) minus 17.69% (with the hedgerow percentage change remaining the same). However, it should be noted that the Metric indicated that Trading Rules were not satisfied using these parameters.
- 9) It should also be noted that it would appear the numbering of the proposed new hedgerows on Figure 2 (Illustrative Landscape Plan) as provided within the Applicant's BNG 2022 report appear to be incorrect (by cross-reference to Table 11 of the BNG 2022 report, and Figure 1 of the same report). Specifically, it would appear that H8 should be H9, H9=H10, and H10=H11.
- 10) Staying with hedgerows, Paragraph 4.4 of the Applicant's BNG report states: "*The retention of woodland and hedgerow habitats will maintain the green corridors throughout the Site and connectivity with the surrounding habitats and the proposed hedgerow and buffer planting will increase the connectivity throughout the Site by creating corridors between retained habitats.*" However, in contradiction to this statement, it is noted that a likely key hedgerow (H2 on Figure 1 of the Applicant's 2022 BNG report) has been identified for removal as part of the proposals. This hedgerow is highly likely to be providing a green corridor between Stonydean Wood and Netherground Spring (it is also of note here that the original ES, in Table 12.7, scopes hedgerows out of further assessment, but as H2 has been assessed as 'Important' (further to the Hedgerows Regulations 1997)¹⁵, further details are required from the Applicant to understand how hedgerows have been scoped out of further assessment). Based on the masterplan, it would appear that Stonydean Wood will become isolated from the wider landscape as a result of the proposals, which could lead to fragmentation for a range of species. Further, although Paragraph 4.4 states that the proposed hedgerows (and buffer planting) will increase connectivity through the site; the main areas of hedgerow planting are largely located adjacent to the existing woodlands, and would therefore unlikely increase

¹⁵ As stated in **Appendix 12.7** - Hedgerow Assessment Report (Ecology and Land Management, 2021)



connectivity to allow a range of species to permeate through the site and into surrounding habitats.

- 11) It should be noted that all the above calculations have been made in the absence of the full tables used by the Applicant, and the relevant plans to verify the area and length measurements. If these tables and plans were to be made available, then this would permit Bioscan to verify the results of the Metric calculations.

4 CONCLUSIONS

- 4.1.1 The conclusions provided in the January 2022 Bioscan report remain unchanged. As noted in the introduction of this report, the above serves as a ‘high level’ review of the submitted addendum ecological information; and once the relevant information has been provided by the Applicant then the ecology reports can be subject to further detailed examination. Further, it would appear that the Applicant has not addressed the comments provided in the January 2022 Bioscan report, or the response by Buckinghamshire Council’s ecology officer¹⁶. Consequently, based on the information provided by the Applicant thus far, a full and robust assessment of all the submitted ecological documents cannot be made.
- 4.1.2 In respect of the Applicant’s updated BNG report, the net gain proclaimed by the Applicant appears to be incorrect, by some margin, and on the contrary, it appears that the proposals would result in a negative situation (i.e. a considerable loss of biodiversity, quantified as approaching -18%). Such a loss would be contrary to the Environment Act 2021, and local and national policy. In order to allow for these figures to be examined further, the Applicant should supply the raw spreadsheet calculations to allow for full transparency and public scrutiny, and before any determination of the application is considered.

¹⁶ Buckinghamshire Council’s ecology officer’s response dated 25th January 2022.



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