



TOM CLARKSON
ECOLOGY PROOF OF EVIDENCE
SUMMARY

LAND AT ORCHARD FARM, PERSHORE

DATE

04th October 2024.

PINS Ref: APP/H1840/W/24/3347643

LPA Ref – W/23/02112/OUT





ECOLOGY PROOF OF EVIDENCE

SUMMARY

1. The summary proof of evidence has been prepared by Mr Clarkson, a highly experienced and qualified ecologist and full member of the Chartered Institute of Ecology and Environmental Management (CIEEM).
2. The proof sets out the importance of the Tiddesley Wood as both a site of special scientific interest and an ancient woodland site and also includes an independent appraisal of the ecological assessment work completed by the appellant.
3. The proof of evidence includes an overview of the ecological work that has been undertaken in support of the application. In general the work completed has been carried out to a high standard and the detailed ecological protected species studies undertaken are in accordance with best practice.
4. I have completed a review of the Biodiversity Net Gain (BNG) Assessment completed for the site and compared this with my own notes following the walkover survey. I would encourage the appellant to review the existing BNG assessment and adopt a rather more precautionary approach as I am concerned that the current assessment slightly underestimates the baseline value for biodiversity. I would explain within my proof that the inclusion of enhancement of the Special Site of Scientific Interest (SSSI) woodland within BNG calculations is counter to Natural England advice and this enhancement work should be excluded from BNG calculations.
5. The site has been noted to support a range of protected species with the most significant being the presence of a lesser horseshoe maternity, night and hibernation roost; the presence of a population of bats of County importance with a regionally important population of barbastelle bats using the site.
6. Considering the importance of the site for bats additional detail on the areas requiring particular protection, such as through preparation and submission of a dark corridors plan/lighting parameters plan (or similar). I accept that a detailed lighting assessment may be conditioned by the application but the principles and areas which require particular protection should be clearly defined in this outline application. I would consider it straightforward for the applicant to provide this additional information.
7. The key consideration within this appeal and one of the key reasons for refusal proposed by Wychavon District Council are the effects of the development upon Tiddesley Wood a Site of Species Scientific Interest and Ancient Woodland. In particular the increase in recreational pressure upon this Ancient Woodland and the consequent effects this has on the irreplaceable habitat and qualifying features of the SSSI.
8. I detail within my proof that Natural England consider that deterioration of an ancient woodland can result from a range of different direct and indirect effects, including increases in disturbance to wildlife, such as noise from additional people.



9. The mitigation measures proposed by the applicant are designed to manage certain aspects of increased recreational pressure, in particular damage to paths, trampling and compaction. This is achieved through a significant programme of works to formalise and improve pathways within the woodlands. I am confident that the measures that are proposed will help to adequately manage issues such as trampling and prevent further deterioration of the woodland which might otherwise be anticipated with a substantial influx of new visitors.
10. The measures proposed will not however address the resulting disturbance that a significant influx of new visitors to the woodland will generate. Natural England consider disturbance of wildlife resulting from noise can lead to deterioration of ancient woodland sites and I set out why this disturbance would also have adverse effects upon the important population of woodland birds which is a qualifying feature of the SSSI. Irrespective of the success of the measures proposed by the appellant to improve the paths through the woodland and assist with ongoing funding of management at the woodland, there will be an increase in disturbance for which there is no clear mitigation solution.
11. In this instance the proximity of the development and the resultant significant increase in the number of visitors to the woodland will result in an unacceptable risk of deterioration to the Ancient Woodland site. Alternative housing developments set further away from the woodland would not be expected to have the same level of recreational pressure on the woodland as the current application.
12. I also set out how the exercising of dogs would also be likely to constitute a further pathway through which degradation of the ancient woodland would occur and that whilst mitigation is offered for this it seems highly unlikely that this would avoid all adverse effects associated with this.
13. Similarly, the proof also examines the impact that a substantial increase in cats would be likely to have upon the small mammal and avifauna (birds) within the woodland and I explain why this could constitute an adverse effect for which there is little/no effective mitigation available.
14. The combination of increased numbers of visitors to the woodland and the ensuing noise and disturbance which results, alongside the increased numbers of dogs and associated eutrophication, and the significant increase in the numbers of cats within the general area mean that, even after the mitigation measures proposed by the appellant are considered, there will be residual adverse effects upon the SSSI, and deterioration of the ancient woodland.
15. Consideration of the irreplaceable nature of the ancient woodland habitat every effort should be made to avoid consenting projects which might result in their deterioration.
16. My conclusion is therefore that the scheme cannot avoid adverse effects upon the SSSI and would also result in deterioration of the ancient woodland. NPPF 186 (b) and 186(c) both indicate that in view of these harms the application must satisfy certain requirements (i.e. public benefit test and wholly exceptional reason test) or be refused.