

For and on behalf of
Boningale Developments Limited

Ecology Proof of Evidence of Mr Daniel Ross BSc (Hons) ACIEEM

Albrighton South

Outline application to include access for a mixed-use development comprising up to 800 dwellings, a care home of up to 80 units, a secondary school and local centre with associated access, infrastructure, landscaping and drainage

Shropshire Council Reference: 24/02108/OUT

PINS Reference: 6007402

Prepared by Daniel Ross
Beamsley Ecology Ltd

August 2026

Prepared by:	Daniel Ross BSc (Hons) ACIEEM, Director (Ecology)
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1.0 EXPERIENCE

- 1.1 My name is Daniel Ross. I have a BSc Honours Degree in Biology and I am a Member of the Chartered Institute of Ecology and Environmental Management (CIEEM).
- 1.2 I am a Director at Beamsley Ecology Ltd, which is an ecological consultancy.
- 1.3 I have worked in Ecological Consultancy for over 12 years, including within multidisciplinary international consultancies, and SMEs. This has included undertaking work on behalf of both private and public sector clients on projects across the UK, including the preparation of Preliminary Ecological Appraisals, Ecological Impact Assessments, Biodiversity Net Gain assessments, protected species surveys, Habitats Regulations Assessments and expert evidence for planning appeals for development across a range of sectors and scales, including rail, housing, industrial, commercial, media, and energy.
- 1.4 The evidence I have prepared and provided for this appeal (APPEAL REF) is in support of Outline Planning Application (application ref: 24/02108/OUT) to include access, for a mixed-use development comprising up to 800 dwellings, a care home of up to 80 units, a secondary school and local centre with associated access, infrastructure, landscaping and drainage.
- 1.5 I confirm that the evidence I have prepared for this appeal is true and has been prepared in accordance with the guidance of my professional institution, CIEEM. The opinions expressed are my own and represent my true and professional judgement.

Signed	
Name	Daniel Ross BSc (Hons) ACIEEM
Position	Director, Beamsley Ecology Ltd
Date	17/08/2026

2.0 BACKGROUND

- 2.1 This Proof of Evidence has been prepared to address ecological matters relating to the proposed development at Albrighton South (the 'Site'), which is subject to planning appeal ref: 6007402. The appeal has been submitted by Boningale Developments Limited (the 'Appellant') against the decision of Shropshire Council (the 'Council') to refuse outline planning permission (ref: 24/02108/OUT).
- 2.2 There were no reasons for refusal (RfR) relevant to ecology.
- 2.3 Ecological matters were considered throughout the determination of the planning application over a period of approximately eighteen months. During this period, the Applicant submitted a suite of ecological surveys, technical assessments and supporting information in response to consultation with Shropshire Council's Planning Ecologist.
- 2.4 I was originally involved in the project whilst employed by CASS Design Consultants, where I prepared the Preliminary Ecological Appraisal and associated Great Crested Newt eDNA Technical Note submitted in support of the application. Following the establishment of Beamsley Ecology Ltd, I was instructed directly by the Appellant to prepare the Biodiversity Net Gain Feasibility Assessment and Wintering Bird Survey. During the remainder of the application process, Phil Jones Associates ("PJA") were appointed to prepare the additional ecological information requested by the Council, including updated Biodiversity Net Gain assessments, protected species surveys and technical responses to consultation comments from the Council.
- 2.5 For the purposes of this appeal, I have reviewed the entirety of the ecological evidence submitted during the planning application, together with the consultation responses, committee report, decision notice and the Rule 6 Party Statement of Case. My evidence therefore considers the complete ecological evidence base to be addressed in the appeal.
- 2.6 Documents relating to ecology that were issued as part of the outline planning application are listed in the table below in chronological order.

Table 1: *Summary of Ecological Submission During Determination*

Document Title	Document Reference	Author	Core Document Reference No.
Preliminary Ecological Appraisal	SH5034(5)C.R.01.1 Version 1 17/04/2024	CASS Design Consultants	CD9.1
Great Crested Newt eDNA- Technical Note	SH5034(5)C.R.02.01 Version 1 07/06/2024	CASS Design Consultants	CD9.4
Biodiversity Net Gain Feasibility Assessment	BE0010.R.01.3 Version 3 04/12/2024	Beamsley Ecology Ltd	CD9.24

Wintering Bird Survey Report	BE0010.R.02.3 Version 3 04/06/2025	Beamsley Ecology Ltd	CD9.5
Biodiversity Net Gain Report	09209 BNG001 Version A 26/08/2025	PJA	CD9.2, CD9.3 and CD9.6–CD9.18
Reptile Survey Report	09209 R001 Version A 15/09/2025	PJA	CD9.20
Shropshire Council Ecology Consultation Responses	SC_ECOLOGY-5349827 - Undated SC_ECOLOGY_COMMENTS-5495842 – 13/01/2025 SC_ECOLOGY-5578966 – 28/04/2025 SC_ECOLOGY_COMMENTS-5730801 – 30/10/2025 SC_ECOLOGY-5755495 – 27/11/2025	Shropshire Council Ecology	CD17.1

- 2.7 The ecological evidence was developed through an iterative consultation process between the Applicant and Shropshire Council's Planning Ecologist. Rather than identifying fundamental ecological constraints to development, the consultation process sought additional survey information, technical clarification and refinement of the Biodiversity Net Gain strategy as the scheme evolved through the determination process.
- 2.8 The table below provides a summary of the ecological consultation between the Applicant and the Council during determination of the application.

Table 2: *Summary of Ecological Consultation During Determination*

Date / CD Reference	Party	Matter Raised / submission	Outcome
08/07/2024 CD17.1	Shropshire Council Ecology	Requested further protected species surveys and additional Biodiversity Net Gain information.	Additional surveys commissioned.
13/01/2025 CD17.1	Shropshire Council Ecology	Requested habitat condition assessment data, further Biodiversity Net Gain information and clarification regarding the Biodiversity Gain Hierarchy.	Further BNG information was provided, with the earlier feasibility assessment subsequently superseded by PJA's BNG Report and associated statutory metric and

			supporting information.
28/04/2025 CD17.1	Shropshire Council Ecology	Further comments relating principally to Biodiversity Net Gain, District Level Licensing and supporting ecological information.	Addressed through additional submissions and revised ecological documentation.
25/08/2025 CD9.19	Applicant (PJA)	Provided a comprehensive response to the Council's ecological consultation, setting out the proposed survey strategy, confirming entry into District Level Licensing for great crested newts, and justifying a phased approach to protected species surveys appropriate to an outline application.	
30/10/2025 CD17.1	Shropshire Council Ecology	Final technical comments relating to river condition assessment, Biodiversity Net Gain, District Level Licensing and implementation.	Further technical clarification requested in relation to Biodiversity Net Gain, District Level Licensing and outstanding protected species surveys prior to determination.
11/11/2025 CD9.22	Applicant (PJA)	Comprehensive response to the County Ecologist's final consultation comments, providing clarification on Biodiversity Net Gain, River Condition Assessment, District Level Licensing, protected species surveys and confirming that, aside from ongoing bat and breeding bird surveys, the ecological baseline had been established.	Provided a comprehensive response addressing the remaining technical matters and confirming the ecological baseline was substantially complete.
27/11/2025 CD17.1	Shropshire Council Ecology		Confirmed that she was satisfied with the remaining surveys submitted, with the outstanding matters relating to the signed DLL documentation and the results of the bat activity and breeding bird surveys.
16/12/2025 CD1.3	Shropshire Council	Planning permission refused.	Ecology did not form part of the reasons for refusal.

- 2.9 The application was initially supported by a Preliminary Ecological Appraisal, which established the principal habitat and protected-species considerations associated with the Site and identified the requirement for further survey and assessment. A subsequent great crested newt eDNA survey confirmed the presence of the species within ponds on and adjacent to the Site.
- 2.10 During determination, the ecological evidence base was progressively expanded in response to consultation with Shropshire Council's Planning Ecologist. This included the submission of a Biodiversity Net Gain Feasibility Assessment, a Wintering Bird Survey Report, an updated Biodiversity Net Gain Report and statutory metric, reptile surveys, white-clawed crayfish surveys, a River Condition Assessment and associated technical information.
- 2.11 The Council's consultation responses requested further information relating principally to the delivery of the statutory Biodiversity Net Gain requirement and the completion of the protected-species surveys identified by the Preliminary Ecological Appraisal. Further submissions were therefore made throughout determination, including revised BNG calculations, condition assessments, details of the proposed on-site and off-site habitat delivery, and clarification of the proposed licensing and survey strategies.
- 2.12 PJA provided detailed responses to the Council's comments in August and November 2025. These responses confirmed the proposed use of Natural England's District Level Licensing scheme for great crested newts, provided the outstanding River Condition Assessment information, addressed the delivery and securing of Biodiversity Net Gain, and reported the completion of reptile and white-clawed crayfish surveys.
- 2.13 By the Council's final ecology consultation response of 27 November 2025, the Council's Planning Ecologist had reviewed the submitted BNG information and identified the requirements for securing the gains, confirmed that she was satisfied with the remaining surveys submitted, and identified the signed District Level Licensing documentation and the bat activity and breeding bird survey results as the outstanding matters.
- 2.14 Ecology did not subsequently form part of the Council's reasons for refusal. The evidence available at determination did not indicate a fundamental ecological constraint to development. The outstanding seasonal surveys nevertheless required completion to provide a comprehensive and up-to-date evidence base.

3.0 APPEAL STAGE ECOLOGICAL EVIDENCE

- 3.1 During the determination of the planning application, the absence of stage two protected species surveys was raised by the Albrighton Development Action Group, Shropshire Council's Planning Ecologist and the Shropshire Wildlife Trust. These surveys were identified within the Preliminary Ecological Appraisal as being appropriate to inform the detailed design of the proposed development and, due to the timing of the application and the seasonal constraints associated with ecological survey work, were not complete at the point the application was determined.
- 3.2 The ecological information prepared for the appeal falls into three categories. First, new survey evidence has been obtained in relation to breeding birds, bat activity and roosting bats. Secondly, the Preliminary Ecological Appraisal has been updated to verify the current habitat baseline and account for the age of the original assessment. Thirdly, the Biodiversity Net Gain assessment has been updated following a comprehensive review undertaken for the appeal. The remaining ecological reports have been reviewed with regard to their age, the ecological receptors concerned and whether any material change has occurred, and do not require updating solely by reason of the passage of time.
- 3.3 The appeal-stage breeding bird survey programme has been completed and the bat survey programme is substantially complete, with one further static-monitoring period (5-nights) scheduled for September 2026, which will be made available on 7 September. The Bat Activity Survey Report assesses the survey information available to date, with the results of the remaining monitoring period to be reviewed and reported once available.
- 3.4 The results have not identified any ecological constraints of a nature or scale that would materially alter the conclusions of the ecological assessments submitted with the planning application or require any significant changes to the proposed development.
- 3.5 The Appellant has attempted to engage with the Council to agree a Statement of Common Ground, however no response has been received to date.

Table 3: *Appeal Stage Ecological Information*

Document Title	Document Reference	Author	Core Document Reference No.
District Level Licensing Impact Assessment and Conservation Payment Certificate (IACPC)	DLL-ENQ-SHRP-00086-2 - Countersigned DLL IACPC with annex map – 03/08/2026	Natural England	CD9.25
Updating Preliminary Ecological Appraisal Report	BE0010.03.01.1 Version 1 Date: 06/08/2026	Beamsley Ecology Ltd	CD9.26

Bat Activity Survey Report	BE0010.07.01.1 Version 1 Date: 17/08/2026	Beamsley Ecology Ltd	CD9.27
Breeding Bird Survey Report	BE0010.08.01.1 Version 1 Date: 10/08/2026	Beamsley Ecology Ltd	CD9.28
Biodiversity Net Gain Report	BE0010.09.01.3 Version 1 Date: 09/08/2026	Beamsley Ecology Ltd	CD9.29
Biodiversity Net Gain Statutory Metric	BE0010.XLS.02.1 Version 1 Date: 05/08/2026	Beamsley Ecology Ltd	CD9.30
Ground Level Tree Assessment (GLTA) and Emergence Survey Report	BE0010.10.01.1 Version 1 Date: 17/08/2026	Beamsley Ecology Ltd	CD9.31
Shropshire Council Ecology Consultation Response	26-03479-REF 12/08/2026	Shropshire Council Ecology	CD17.1

- 3.6 As the application is in outline, the detailed habitat creation and management proposals, together with any species-specific mitigation, lighting controls and other ecological measures, will be developed through the reserved matters process. Ecological surveys will be reviewed and updated at that stage where required, having regard to the age of the survey data, the proposed phasing of development and the detailed design of each phase. The retained habitats, proposed green infrastructure and habitat creation incorporated within the outline proposals provide an appropriate scope within which those detailed measures can be delivered.
- 3.7 In relation to great crested newts, surveys confirmed the presence of the species within ponds adjacent to the Site. The proposed development will therefore be delivered through the Natural England District Level Licensing Scheme. A signed Impact Assessment and Conservation Payment Certificate (IACPC) is provided for the appeal (CD9.25). Accordingly, impacts to great crested newts will be addressed through the statutory licensing process administered by Natural England, ensuring compliance with the Conservation of Habitats and Species Regulations 2017 (as amended).

4.0 ECOLOGY POLICY CONTEXT & STATUS AT APPEAL

- 4.1 By the conclusion of the determination process, ecology was not identified as a reason for refusal.
- 4.2 Having reviewed the Rule 6 Party Statement of Case, I note that ecology is not identified as one of the matters in dispute at the Inquiry.
- 4.3 Notwithstanding that ecology does not form a reason for refusal and has not been identified by the Rule 6 Party as a principal matter in dispute, I have prepared this Proof to assist the Inspector by providing a comprehensive review of the ecological evidence supporting the appeal.
- 4.4 Although an Ecology Statement of Common Ground has not been agreed, no contrary professional ecological case has been advanced by the Council or the Rule 6 Party. Ecology did not form a reason for refusal. In its final ecology consultation response of 27 November 2025, the Council's Planning Ecologist confirmed that she was satisfied with the remaining protected-species surveys that had been submitted, with the outstanding matters limited to the signed District Level Licensing documentation and the results of the bat activity and breeding bird surveys. Those matters have subsequently been addressed for the appeal.
- 4.5 Following submission of the Updating Preliminary Ecological Appraisal Report (CD9.26), Biodiversity Net Gain Report and Statutory Metric (CD9.29 and CD9.30) and Breeding Bird Survey Report (CD9.28), Shropshire Council Ecology issued a further consultation response dated 12 August 2026. No ecological objection was raised, although the response identified requirements for the securing and detailed delivery of Biodiversity Net Gain and breeding-bird mitigation and recommended a series of ecological planning conditions. At that date the bat survey reports had not been submitted and the Council therefore reserved its comments on bats pending their receipt.
- 4.6 Collectively, this work has established the habitats and ecological features present, identified how protected and notable species use the Site, assessed the likely effects of the proposed development and informed the mitigation and enhancement framework. The majority of the appeal-stage survey work has now been completed and has not identified any ecological constraint requiring a fundamental change to the proposed development.

Policy Framework

- 4.7 The principal national and local policies relevant to ecological matters are paragraphs 187 and 193 of the National Planning Policy Framework, Core Strategy Policies CS6 and CS17, and SAMDev Policy MD12. The ecology-related requirements of those policies, and the manner in which they are addressed by the appeal proposals, are summarised below.

Table 4: *Policy Summary*

Policy	Relevant Ecological Requirement	Appeal Evidence and Response	Professional Conclusion
NPPF paragraphs 187(d) and 193	Minimise biodiversity impacts, provide net gains, and apply avoidance, mitigation and compensation where harm arises.	Retention of principal higher-value features; assessed habitat and species effects; mitigation and compensation; statutory BNG strategy.	No significant adverse residual ecological effect is anticipated; the statutory BNG requirement is capable of being met.
Core Strategy CS6	Protect, restore, conserve and enhance the natural environment, having regard to ecological strategies and local context.	Retention of ponds, woodland, mature trees, watercourses and much of the hedgerow network; habitat creation and species measures through detailed design.	The informed approach to the Site design accords with the ecology-related requirements of CS6.
Core Strategy CS17	Identify, protect, enhance and connect environmental assets; avoid significant adverse impacts and severance of ecological links; provide for long-term management.	Connected green infrastructure; retention of boundary habitats and watercourses; replacement habitat; long-term BNG management secured by appropriate legal mechanisms.	The proposals retain and strengthen the principal ecological network and are considered to accord with the ecology-related requirements of CS17
Shropshire Council Site Allocations and Management of Development (SAMDev) Plan Policy MD12	Assess effects on natural assets; avoid harm where possible; then mitigate and, as a last resort, compensate; conserve, enhance and connect natural assets.	Comprehensive ecological assessment; mitigation hierarchy applied; on-site habitat provision supplemented by identified off-site land; protected-species measures and DLL.	The identified ecological effects have been addressed in accordance with the hierarchy in MD12.
Statutory BNG	Deliver at least 10% BNG for each relevant unit type and satisfy the trading rules.	Updated metric, on-site measures, identified off-site land and subsequent detailed BNG process.	The scheme is capable of meeting the statutory biodiversity gain objective.

- 4.8 I consider that the proposed development accords with the biodiversity and ecology-related requirements of the National Planning Policy Framework, Core Strategy Policies CS6 and CS17, and SAMDev Policy MD12.
- 4.9 The proposed development is also capable of delivering the 10% gain in biodiversity as required by the Environment Act 2021.

5.0 ECOLOGICAL ASSESSMENT

- 5.1 The ecological effects of the proposed development have been examined through a combination of desk study, habitat survey, Biodiversity Net Gain assessment and targeted species surveys. The evidence base comprises the Preliminary Ecological Appraisal, great crested newt eDNA survey, wintering bird surveys, reptile surveys, white-clawed crayfish surveys, River Condition Assessment, breeding bird surveys, bat activity surveys, ground-level tree assessment and bat roost surveys. The assessment has also been subject to iterative review and consultation with the Council's Planning Ecologist throughout the determination of the application.
- 5.2 Collectively, this work has established the habitats and ecological features present, identified how protected and notable species use the Site, assessed the likely effects of the proposed development and informed the mitigation and enhancement framework.
- 5.3 The majority of the appeal-stage survey work has now been completed and has not identified any ecological constraint requiring a fundamental change to the proposed development.

Summary

- 5.4 The Site comprises predominantly intensively managed arable land divided by hedgerows, together with scattered mature trees, ponds, watercourses and small areas of woodland. The principal habitat effect of the proposed development will arise from the loss of arable land and associated farmland habitat. The arable land is classified as a low-distinctiveness habitat under the statutory biodiversity metric but nevertheless provides some value for a range of fauna, particularly farmland birds.
- 5.5 Targeted surveys have identified a breeding bird assemblage of Local ecological importance, with the principal effect arising from the permanent displacement of skylark and the loss of habitat used by other farmland birds. Bat surveys identified the Site as being of Local ecological importance for foraging and commuting bats, with activity principally associated with the hedgerow, tree and woodland network; no bat roosts were identified and use by rarer species was infrequent and at very low levels. These findings do not represent a fundamental constraint to development but require appropriate mitigation through habitat retention, compensation, sensitive lighting and detailed green infrastructure design.
- 5.6 The proposed development will result in localised adverse effects, principally through the loss of arable habitat and the associated reduction in habitat opportunities for fauna. These effects have been evaluated through the habitat assessment and targeted species surveys and are not considered to represent a significant ecological constraint to development. Mitigation and compensation are proposed through the retention and management of existing habitats, the creation of new habitats within the development, and the use of additional land within the Appellant's control.
- 5.7 The ecological strategy incorporates avoidance, mitigation, compensation and enhancement.

Existing habitats of greatest ecological value will be retained within a connected network of green infrastructure, with new grassland, scrub, woodland, hedgerow, orchard and wetland habitats created alongside the enhancement and long-term management of retained habitats.

- 5.8 Species-specific measures will be developed through the detailed design and reserved matters process and will include controls over vegetation clearance and construction activity, sensitive lighting design, the provision of bat roosting and bird nesting opportunities, and precautionary working methods where required. Ecological surveys will be reviewed and updated for individual phases where necessary, having regard to the age of the information and the detailed proposals.
- 5.9 Great crested newts have been confirmed as present within ponds on and adjacent to the Site, and effects upon the species will be addressed through entry into Natural England's District Level Licensing scheme. No reptiles were recorded during the targeted surveys and reptiles are considered likely to be absent. Common toads were recorded and can be safeguarded through a precautionary working method statement and the provision of suitable terrestrial and aquatic habitats. White-clawed crayfish were not identified, and the surveyed watercourses were assessed as having low suitability for the species. No bat roosts were identified, and the recorded activity did not indicate any effect that would materially constrain the proposed development.

Biodiversity Net Gain

- 5.10 The Biodiversity Net Gain assessment has been subject to detailed review during both the determination of the application and the appeal. The assessment applies the statutory biodiversity metric separately to area habitats, hedgerows and watercourses and considers both the habitats within the application boundary and the additional land under the Appellant's control.
- 5.11 The assessment recognises that habitat creation within the development boundary alone cannot entirely offset the loss of area habitat arising from development. Additional habitat creation and enhancement will therefore be delivered on land within the Appellant's control outside the application boundary. This provides the means of addressing the on-site deficit while retaining the spatial relationship between the development and the compensatory habitats.
- 5.12 The revised BNG assessment produced during the appeal identifies anticipated gains of 15.50% in area habitat units, 10.92% in hedgerow units and 23.06% in watercourse units. The proposals are therefore capable of meeting the statutory requirement for a minimum 10% Biodiversity Net Gain across each relevant unit type and satisfying the trading rules. The final habitat specifications, target conditions and management requirements will be developed through the detailed design and statutory BNG process.
- 5.13 The BNG assessment identifies the off-site land and the habitat creation and enhancement measures required to deliver the stated gains. Delivery, long-term management and monitoring of the on-site and off-site gains will be secured through the statutory Biodiversity Net Gain process and by means of conditions and the S106 as required.

Ecological Effects

- 5.14 The ecological response has been informed by the survey and assessment work undertaken for the application and appeal and by application of the mitigation hierarchy. In my professional opinion, the proposed response is proportionate to the ecological value and use of the Site and is deliverable within the parameters of the outline proposals. The principal ecological features will be retained, with detailed mitigation, compensation and enhancement measures developed through the reserved matters process.
- 5.15 The principal adverse effects arise from the loss of low-distinctiveness arable habitat and associated opportunities for farmland birds, particularly skylark, together with more limited effects on bat foraging and commuting habitat. The proposed bird-mitigation land provides scope to substantially reduce the effect upon skylark, although its detailed capacity will need to be demonstrated through a Bird Mitigation and Monitoring Strategy. Subject to appropriate farmland-bird mitigation, retention and enhancement of the identified habitat network, sensitive lighting and other species-specific measures, no significant adverse ecological effect is anticipated above the Local level.
- 5.16 In addition, the revised Biodiversity Net Gain assessment demonstrates measurable gains in biodiversity value. These gains will be secured through the statutory BNG process, reserved matters, appropriate planning conditions and the legal agreement for the off-site land. As the proposed habitats establish and mature, the development is therefore capable of delivering a positive ecological outcome relative to the existing baseline.

6.0 CONCLUSION

- 6.1 The ecological evidence base was developed during determination and has been supplemented and updated for the appeal. The ecological baseline is sufficient to allow the likely ecological effects of the proposed development to be understood and assessed, and the appeal-stage survey work has not identified any ecological constraint requiring a fundamental change to the principle, scale or form of the proposals.
- 6.2 Subject to the identified avoidance, mitigation and compensation measures being secured and implemented, the identified adverse ecological effects are not anticipated to result in any significant adverse effect at District or higher level. A local residual effect upon skylark may remain unless the detailed bird-mitigation strategy demonstrates sufficient capacity to maintain the affected number of territories. Taking account also of the proposed enhancement and Biodiversity Net Gain measures, it is my professional opinion that the proposed development is acceptable in ecological terms.