

**Berkshire, Buckinghamshire &  
Oxfordshire Wildlife Trust**  
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FAO Jenny Barker

**By email only**

1<sup>st</sup> October 2015

Dear Jenny,

**OBJECTION Re: 14/02121/OUT Development proposed at Himley Village, North West Bicester**

Thank you for consulting the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) on the additional information submitted for the above planning application. As a wildlife conservation charity, our comments relate specifically to the protection and enhancement of the local ecology on and around the application site.

As you will be aware, I submitted an objection in response to the previous consultation on this application (in my letter of the 25<sup>th</sup> March 2015). The addendum to the Environmental Statement that has now been submitted goes some way towards addressing my concerns and I can remove my objections in relation to:

- Lack of compensation for impacts on UK priority farmland bird species, contrary to paragraphs 117 and 118 of the NPPF
- Lack of apparent compliance with Masterplan standards for buffering of hedgerows

**However, I maintain an objection due to a failure to demonstrate a net-gain in biodiversity, contrary to NPPF paragraphs 9 and 109 and Eco Towns Planning Policy Statement PPS1, and also a lack of apparent compliance with Masterplan standards for buffering great crested newt breeding ponds.**

**Compensation for loss of farmland bird habitat**

In terms of compensation for UK priority farmland bird species; whilst the addendum to the ES underplays the value of the site for this group of species (please see my comments relating to breeding skylark, yellowhammer, linnet and song thrush in my previous letter), we welcome the commitment from the applicant to deliver off-site compensation for farmland birds through a legal agreement with the Local Authority. Assuming that an appropriate legal agreement is achieved, I am able to withdraw my objection relating to lack of compensation for impacts on priority farmland bird species.

### **Standards for buffering habitats**

We welcome the clarification provided by the addendum to the ES to confirm that a 10m buffer will be provided either side of hedgerows, and that a 40m wide dark corridor will also be provided. I suggest that these standards are secured by planning condition.

However, Section 5.3.1 the Biodiversity Strategy for the Masterplan site also identifies the need for a 50m buffer around the newt ponds found within the Himley Village area, and I have found no reference to this within the application materials. I therefore maintain an objection due to lack of compliance with standards set out in the Masterplan.

### **Delivering a net gain in biodiversity**

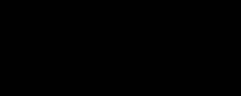
Unfortunately, whilst the applicant has attempted to apply the DEFRA Biodiversity Metric, they have done so in such a way as to indicate how much offsite compensation is required for farmland birds. However, it was not requested that the metric be applied in this respect, rather that it be used to demonstrate whether or not the development will achieve a net gain in biodiversity. Therefore, the metric needs to be applied to give the site a score pre-development and a predicted score post development. The metric has been applied across the Masterplan site in the Biodiversity Strategy (see Biodiversity Strategy Appendix 6J) , and I suggest this method of assessment should be applied using the detail available for this individual application site.

At this stage, a planning application for the land to the west of the application site has not been made; it is within this area of the Masterplan that space has been set aside to provide a nature reserve. The nature reserve will make a significant contribution to the achievement of a net gain in biodiversity across the Masterplan area and assurance is sought to demonstrate that delivery of the nature reserve will be secured to support the applications currently coming forward within the Masterplan site.

My previous comments relating to details to be addressed by reserved matters still apply.

I hope that these comments are useful; should you wish to discuss any of the matters raised, please do not hesitate to get in touch.

Yours sincerely,



Rebecca Micklem  
Senior Conservation Officer (Oxfordshire)

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