

## Lynne Baldwin

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**From:** DC Scanning  
**Sent:** 28 May 2024 16:19  
**To:** DC Support  
**Subject:** FW: 24/00539/F - Land To The East Of Stratfield Brake And West Of Oxford Parkway Railway Station, Oxford Road, Kidlington

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**From:** Laura Bell <Laura.Bell@Cherwell-DC.gov.uk>  
**Sent:** Tuesday, May 28, 2024 3:36 PM  
**To:** DC Scanning <DCScanning@Cherwell-DC.gov.uk>  
**Subject:** FW: 24/00539/F - Land To The East Of Stratfield Brake And West Of Oxford Parkway Railway Station, Oxford Road, Kidlington

For logging in DEF as a preliminary Ecology consulta•on response please

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**From:** Charlotte Watkins <[Charlotte.Watkins@Cherwell-DC.gov.uk](mailto:Charlotte.Watkins@Cherwell-DC.gov.uk)>  
**Sent:** Tuesday, May 7, 2024 10:15 AM  
**To:** Laura Bell <[Laura.Bell@Cherwell-DC.gov.uk](mailto:Laura.Bell@Cherwell-DC.gov.uk)>  
**Subject:** 24/00539/F - Land To The East Of Stratfield Brake And West Of Oxford Parkway Railway Station, Oxford Road, Kidlington

Laura

24/00539/F  
Ecology response  
Land To The East Of Stratfield Brake And West Of Oxford Parkway Railway Station, Oxford Road, Kidlington

Please consider this to be a preliminary response based on information reviewed to date, I have not yet included recommendations for conditions or agreement.

There are two main ecological considerations on site – whether the current value of the site has been appropriately measured and reflected in the metric/documentation and whether the proposals for the site are suitable such that a minimum of 10% net gain can be achieved on site and the current ecological interest can be safeguarded/mitigated.

### Surveys

Bird surveys – only three visits have been carried out for breeding birds and these were all in June. Accepted practice is for more surveys than this and ideally with some to be earlier/later to reflect a greater proportion of the breeding season. No wintering bird surveys have been carried out. Due to the constrained space and likely disturbance on site, full mitigation for the bird species found is likely to be difficult and off site mitigation for birds should be considered.

Great crested newts – The Newt officer (Nature space) has objected on the basis of insufficient information and we would expect action to be taken to overcome this objection, either through additional survey data or through joining the district licence scheme.

Invertebrates – The technical appendix (Ecology) states that ‘invertebrates have been included in the ecology assessment of the Site and information can be viewed within section 8.6 below’ however there does not appear to be a section 8.6? Only Hairstreak butterflies seem to have been assessed. It is stated

that the surveys by Judith Webb 'reduce the need for further survey'. Therefore going by the information in the independent ecologists (J Webb) reports - the site appears to be of relatively high ecological value for invertebrates with at least two species on site classed as Conservation Status 'Rare'. The loss of the habitat to support these rare species must be taken into account therefore in assessing impacts however within the technical appendix only impacts on common invertebrates and brown hairstreaks seem to have been assessed. A dedicated invertebrate survey would have been expected here and assessment of how impacts on notable species dependent on the current habitats can be mitigated. Without these an updated assessment using the independent report as the basis for what is likely to be present should be made.

Similarly, there are discrepancies, in terms of botanical value and abundance of rarer plant species, between the findings of the independent ecologists survey and that of Ecology Solutions - who have not carried out a dedicated botanical survey. Relying on the independent survey information there is an (unquantified) area of rare and notable plant species present. Ecology Solutions states 'If deemed necessary, a transplantation exercise will be conducted which will involve moving the plants that are of greater conservation value (e.g. Narrow-leaved Bird's-foot-trefoil, Corn Mint, Pyramidal Orchid and Two-spotted Orchid) to dedicated areas left for biodiversity.' However it should be made clear under what conditions this will be deemed necessary (following additional survey?) and where a dedicated suitable area for this would be located on site.

A botanical survey might also have given clarity as to the appropriateness of the categories assigned within the BNG metric. Whilst short-rotation coppice does come under 'non-cereal crops' within the UKHabs, consideration should be given as to whether some parts of the SCR are more appropriately classified under other categories given the botanical value found within some areas.

There is a good assemblage of bats using all the boundaries of the site, including rarer species such as Barbastelle. The Western boundary vegetation is to be largely lost and fragmented under the proposals. Keeping the new boundary vegetation as a dark corridor will be important to allow bats to continue to commute across the site and gain any value from the urban trees to be planted on the Western side. At the southern boundary between the two proposed attenuation areas there is a narrow pinch point where the built environment comes very close to the edge of the woodland (District Wildlife Site) with little to no buffer. I have concerns as to how this will affect both the woodland and in particular bats. Prevention of access into the woodland by the public through fencing is positive however the additional noise, lighting and sudden change to an urban fringe in this location may have a detrimental effect on the (potentially ancient) woodland. A strong and unfragmented buffer to the whole length of the woodland boundary needs to be designed in.

### **Biodiversity net gain**

It would be useful if the user comments section of the metric were filled in to help with assessment. I could not find habitat condition sheets which are important to be included (although they may well be in the documentation – please can they be highlighted to me if I have missed them?).

I think there is a mistake within the Statutory metric submitted, when compared to submitted plans.

The metric shows 81 medium trees and 62 small trees will be planted on site however it is unusual to plant 'medium' sized trees (certainly in this number) as trees are semi-mature at this size with girths of more than 94cm. The illustrative landscape masterplan (OUFC-FAB-00-XX-DR-L-1000-P18) states at key point 15 that '81 trees of *girth* 30cm or above will be planted', however this would not make them 'Medium' trees under the metric guidelines – these should be put in as 'small' trees. 'Medium' is 30cm *diameter at breast height*. If they propose to plant the 81 trees at 30cm girth they would count as 'small' trees (or a diameter at breast height of around 9.5cm..) and this would result in an overall net loss on site.

If they do propose to plant 'medium' trees they need to change the wording in the illustrative masterplan to '**diameter** of 30cm or more' and justify how they will achieve the successful planting of trees this size. Whilst a Habitat Management and Monitoring Plan can be submitted post decision, a draft HMMP would help with demonstrating how the habitats and targets can be achieved.

As far as I can tell (apologies if I have miscalculated), the pitch surface itself has been included in the metric as grassland (albeit modified and poor condition). Whilst this could be argued as correct if looked at in isolation, the pitch would be better considered as a developed surface in my opinion as its biodiversity value is likely to be close to zero being entirely within the stadium building itself and highly managed for a very specific purpose. It would seem inappropriate to subject this surface to being part of an enforced

Habitat Management and Monitoring Plan and restrict how it can or cannot be managed. Removing this area affects the net gain achievable on site so comment must be made on this.

The original plans showed a ditch along the Southern boundary of the site and the DWS woodland. Where ditches are within 5m of the boundary of a site (or within them) these should be counted within the watercourse element of the metric. No watercourse units are show here. Can the applicants ecologist clarify the distances from the site boundary to the closest ditch and whether this should have been scoped into the metric?

It is proposed to have wildflowers and flowering lawns within the 'garden' area to the North to compensate for the loss of grassland interest on site. It is proposed that these will reach 'moderate' condition along with the created scrub. Whilst the plans show paths within the garden area, this is the only amenity space on site and will presumably be used by those going to the stadium, staff, local residents, dog walkers as well as people using the gym and the hotel. There is likely therefore to be an unusually high level of footfall here and I consider that 'fairly poor' condition would be more achievable for much of the publicly accessible areas. A draft HMMP would help to demonstrate why this is felt to be achievable.

I welcome the addition of the biodiverse roof area and green wall.

Please do get back to me on any of these points.

Kind regards  
Charlotte

**Dr Charlotte Watkins**  
**Ecologist**

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