

Suzanne Taylor

From: Charlotte Watkins
Sent: 16 January 2024 14:28
To: Suzanne Taylor
Subject: RE: Planning notification for application reference: 23/00207/DISC 1 of 2

Hello

With regard to the amended SWBS and metric, the issues mentioned below remain though it may be possible to leave some of these until reserved matters when layouts are finalised.

The trading rules have not been met for hedgerows. The guidance for metric 4.0 (used here) clearly states that if the rules are not followed, then a project cannot claim to have achieved a gain in biodiversity. For an exceptional circumstance I think we would be looking for a much greater overall increase in hedgerows to justify the loss of the high distinctiveness habitat. The metric has been amended to show an additional 3% however I'm not sure this would be considered exceptional so off site compensation would need to be considered at reserved matters. This possibility has been left open within the SWBS if layouts change but it should be accepted that this is likely to be required even if final designs remain as now. The loss of high distinctiveness habitats should be avoided.

I could not find the requested comment on ditches. Some of the ditches have been accounted for within the hedgerow module as part of hedgerow habitat however the plans within the SWBS show ditches to the north of the site which are not accounted for. If updated metrics are submitted at reserved matters (they should be) these should include ditches or justification for why they are not included. Ideally we would have this information now.

I still have concern that this biodiversity strategy does not make reference to and in particular does not show how it adheres to the overall guidance of the Masterplan biodiversity strategy or NW Bicester SPD requirements. This would make assessment of how the site fits in holistically with the wider sites biodiversity plans much clearer.

Kind regards
Charlotte

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From: Charlotte Watkins <Charlotte.Watkins@Cherwell-DC.gov.uk>
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To: Suzanne Taylor <Suzanne.Taylor@cherwell-dc.gov.uk>
Subject: RE: Planning notification for application reference: 23/00207/DISC

Suzanne

The actual metric has now been submitted. Whilst I appreciate this is not yet at a detailed design stage there are issues with the metric which should be addressed with comment from the applicant as a minimum.

- The loss of hedgerows of high distinctiveness have not been replaced with hedgerows of the same distinctiveness (or higher) which they must under the trading rules. The trading rules for this linear habitat are not met therefore. Sometimes this may be permitted if there are exceptional circumstances but it has not been justified here.
- There are several ditches on site some of which are said to be wet. Where ditches are on site the watercourse section of the metric must be used and a net gain achieved in this linear habitat also. Here they

have stated there are no ditches on site by leaving the watercourse part blank and there is no justification of exceptional reasons why this has been done within the biodiversity strategy. They have not demonstrated that a net gain is achievable here therefore nor shown the baseline value of these wet features - which should be included in this biodiversity strategy.

Other points to note:

The potential need to go off site for compensation should updated metrics show that a net gain cannot be achieved is stated. This may be acceptable.

4.3.4 Now mentions there will be off site provision for farmland birds – however it does not commit to the form of this – will this be contributed to per phase? or is the proposal to provide their own off site provision. A clearer commitment to the form of this provision would be helpful when this is referred to at reserved matters.

Hedgerows in NW Bicester must have (under the masterplan biodiversity strategy) 10m buffers each side, which should be 'largely diverse grassland'. The proposals here appear to be for hedgerows to be buffered each side with mixed scrub. This may have some ecological benefits but may also make it difficult to manage hedgerows and the impact of shading on hedgerow condition should be considered at the detailed stage.

Kind regards
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