Clare Whitehead
Place and Growth Directorate
Cherwell District Council
Bodicote House
Bodicote, Banbury
Oxfordshire
OX15 4AA

Our Ref: 70058541

28 February 2020

Dear Clare,

Great Wolf Resort, Bicester: WSP Reponses to comments from CDC Ecology Officer 05 February 2020

The following outlines our response to the comments provided in correspondence of 28th January 2020 by Dr Charlotte Watkins (Cherwell District Council's Ecology Officer) to Clare Whitehead, regarding the application 19/02550/F for the Land to the East of M40 and South of A4095, Chesterton, Bicester.

CDC Ecology Officer Comment	WSP Response
With regard to the above application, the submitted surveys within the ES and updates are all sufficient in scope and depth at the current time. There are a number of protected and priority species on site - reptiles, a good population of Great Crested Newts, some scarce invertebrates, a good assemblage of birds.	This acknowledgement of the sufficiency of the survey work undertaken is noted and appreciated.
The proposals constitute a large loss of open space on the current golf course however much of this is amenity grassland which is of limited ecological value. The loss of trees and the general increase in recreational use on site however will impact wildlife on site both in the short and long term. Tree planting is proposed on site which will mitigate for this long term.	The acknowledgement that much of the site is of limited ecological value and that proposed planting is appropriate mitigation is agreed. It is noted that the site is currently subject to recreational use (golf) with associated maintenance pressures. As detailed below, we consider that landscape design effectively mitigates any effects relating to the proposed development.
A pre-commencement update survey for badgers will be required as a condition…	It is agreed that a badger survey is required and can be secured by way of a pre-commencement planning condition.

8 First Street
Manchester
M15 4RP
Tel: +44 161 200 5000
wsp.com

CDC Ecology Officer Comment	WSP Response
…as will a full reptile mitigation plan which should identify any necessary receptor sites. Receptor sites which need to be enhanced for reptiles will need to be done before works commence. The applicants are pursuing a District Level Licence for the impact on Great Crested Newts so some of this impact will be dealt with by offsite provision and compensation. A Habitat Management and Monitoring Plan has been produced which is generally acceptable	Only one species of reptile, grass snake, was recorded on site. One individual was recorded on the edge of the development site, otherwise individuals were recorded in the area of the site where habitats will be improved. The proposals for Great Crested Newt (GCN) mitigation ensure adequate reptile mitigation is in place. As required by the District Level Licence, a GCN translocation will take place, and reptiles present would be captured as part of this process. The District Level Licence requires that on-site compensatory habitats will be created within 6 months of commencement of development activities. These habitats will offer sufficient carrying capacity for any translocated/ displaced reptiles, and the proposed management (detailed in the Habitat Management and Monitoring Plan) is compatible with reptiles. We trust that this additional information provides reassurance and add that a suitably worded planning condition securing the above is acceptable to the applicant.
The assessment of Biodiversity net gain demonstrates a good level of net gain could be achieved on site however they have not submitted the whole metric, only a summary, and it would be useful to see how they have calculated all the figures in the metric itself.	Please see the attached PDF calculations, this represents the working in full.

CDC Ecology Officer Comment	WSP Response
They have rated all the current habitats as 'poor'	We are of the view that the classification of most habitats as being of poor condition (distinctiveness is predefined by Defra) is fully justified. The woody habitats lack a diverse age and height structure, and significant dead wood is absent. All habitats (except perhaps some limited areas of habitat to the peripheries of the site such that would not be affected by the development) are subject to very intensive management (including frequent mowing and fertilizer application), as well as significant recreational pressure through use for golf. Habitats exhibit low species diversity and are relatively recent in origin. The assessment has been made based on professional judgement informed by the *Farm Environment Plan* criteria for condition assessment

CDC Ecology Officer Comment	WSP Response
…and there is some loss of important habitats long term, namely running water. The net gain calculation summary states these are ditches which are often dry and will be replaced by swales however the Phase 1 survey report states there is a small stream (RW1) which looks to also be being lost and I wonder if this is accounted for? I couldn't find anything else on this.	One of the ditches on site was classified as running water in the Phase 1 habitat survey. This survey was conducted in January 2018, and at that time it was holding some water. However, on subsequent visits it was dry and therefore can be classified to be a dry ditch. This is a man-made feature lacking in semi-natural attributes which would not support a significant assemblage of aquatic specialist species. Accordingly, it is appropriate that it can be compensated for by the provision of swales. Further evidence to support this conclusion is provided by the drainage strategy (prepared by *Curtins*), which has been discussed with Oxford County Council as the Lead Local Flood Authority, identifying the stream as a ditch '*Ditch 2… which discharges into an irrigation pond*'. Appendix 8 of the Drainage strategy provides further information regarding the ditch: '*As shown above, there are two existing ditches running across the Site from north to south. It is understood that these ditches were constructed by site maintenance staff to manage ground water. This was confirmed by the site staff during a walkover. The two ditches join in an inspection chamber to the north of the existing hotel*'. Photographs of the ditch are enclosed as further evidence.

CDC Ecology Officer Comment	WSP Response
The opportunity to created higher value habitat as mitigation and enhancement has been taken mainly in the green space to the West of the main buildings. Some of the proposed habitat creation may be difficult to create and maintain in the long term – a large part of the semi-improved grassland for example is within the area from the buildings to the carpark where managing it for wildlife benefit may conflict with other needs.	A small proportion of the total habitat created as part of the proposed development occurs close to the proposed buildings. Whilst we agree that there are challenges in such areas, these areas (as with the whole application site) will be subject to the management specified in the habitat management plan (which will be secured by way of a planning obligation in the section 106). Whilst these areas do offer a challenge in terms of habitat creation it is important to note that they would provide resources to wildlife, such as nectar and resting opportunities. It is also relevant that existing habitats (to be replaced or enhanced as part of the proposed development) include areas located near to the existing hotel and also those subject to significant recreational and maintenance pressure and intervention.
I can't tell if calculations for 'scrub' includes small areas of ornamental planting around the carpark which may be of limited value – these are marked as scrub in the post-development habitat map. Similarly with the low (1.2m) hedging proposed within the large carpark area. This should be clarified.	These areas are included in the net-gain calculation and were classified as dense scrub. This was considered more appropriate than other options such as hedgerow. Notwithstanding, we add that this part of the site (those habitats within the vicinity of the new buildings and car park) contribute approximately 9.7 units to the post development total of 70.9, which overall delivers a net gain of 15.1 units. If this unit contribution were to be reduced, the scheme would continue to deliver a net-gain in biodiversity.
The large strip of amenity grassland to the Southern edge of the buildings would be better replaced with other grassland which would better maintain a wildlife connection between the (current) two halves of the golf course.	This comment is appreciated, and the applicant is happy to agree to this. As part of a final landscape plan (to be secured by way of planning condition) we will need CDC approval working with CDC Ecology and Landscape officers. Any change represents an improvement in the biodiversity net gain calculation and we therefore assume is welcomed.

CDC Ecology Officer Comment	WSP Response
Currently the placement of the buildings isolates the two halves to some extent.	As part of the design team we have worked closely with the architects and landscape architects to reduce fragmentation within the limits of the design layout. Steps taken included maintaining a corridor enhanced by the provision of ponds and woodland planting. In our opinion, when considered alongside connectivity provided by the verges of the adjacent M40, the landscape plan adequately mitigates the effects of fragmentation. Dropped kerbs are also included within the scheme to help facilitate movement through the site.
Overall achievement of net gain will be dependent on the management and use of the green spaces in particular. The Design and Access Statement proposes trails through the Western area and suggests it will be used for walking dogs and recreation. This may not be compatible with maintaining some of the proposed habitats in the best condition for wildlife. In particular some of the suggestions for invertebrates such as sandy banks may be difficult to maintain if the area is heavily used for recreation or dogs are off the lead. The size of the carpark suggests daily footfall could be relatively high in this small space. It would be better if at least some areas were committed to being inaccessible to visitors.	We agree that the management of the proposed nature trails will be important in achieving of the net-gain results. Whilst the development includes a publicly accessible area to the north west, access will be carefully managed through the provision of footpaths and dedicated picnic area and this will be secured by legal agreement. It is currently proposed that the surrounding grassland will be manged to have a tall height, with extensive woodland planting, which are intended to be unattractive for users to deviate from the managed public route. The final landscape details associated with this area are to be controlled by way of a planning condition and therefore this requirement to reflect the biodiversity net gain calculations can be factored into that approval. In terms of dog walking and dogs being allowed off the lead, this area will be public but carefully managed and it is suggested that dogs being on a lead is a requirement. This will be secured by way of a planning obligation requirement a management plan for this area.

CDC Ecology Officer Comment	WSP Response
In addition, the area is shown as being lit at night and I would question the need for this? This area should be kept dark to maximise its value to biodiversity, limit light intrusion for bats and maintain dark corridors around the site. Similarly with lighting there are plans to light up trees – this should be avoided due to its potential impact on the use of trees by nocturnal species. Lighting on the building should be designed with integrated bat/bird provisions in mind.	Lighting is only proposed in the immediate environs of the hotel and car park. This is necessary for operational and health and safety reasons. The contribution of the bollarded lighting and tree illumination would be minimal in the context of the roads and car park to be illuminated. We suggest that locations for bat and bird boxes are reviewed as part of a detailed landscape condition (which we are happy to be a pre-commencement of development condition), to allow consideration alongside detailed designs for lighting, again this will be the subject of detailed approval by way of discharge of a planning condition.
The concerns above could be addressed in a modified lighting plan, making it clear which aspects are included in their net gain, showing where RW1 is accounted for and by a conditioned LEMP which takes recreational pressure and its management into account. The net gain calculation will need updating if there are any changes.	We accept these comments and trust that our responses above provide reassurance regarding the concerns raised. We note that lighting as well as biodiversity net gain may be secured my way of planning conditions, and their discharge will require input from CDC ecology.
A CEMP for biodiversity should be conditioned. There is a draft CMP but this does not address pre-works checks nesting bird surveys or works timings, tree checks for bats where necessary, buffer zones around existing vegetation during construction, protection of retained ponds etc..	We agree that a CEMP is needed to ensure appropriate protections are put in place during construction and that this can be secured by planning condition.

I trust that the responses satisfy the concerns of the CDC officer. If there are any further queries, I would welcome the opportunity for further discussion.

Yours Sincerely

Luke Roberts
Principal Ecologist

Roberts, Luke
2020.02.28
11:56:25 Z

Enclosures:
Photographs of ditch on site, classified as running water by Phase 1 survey
Metric calculations

CC
Peter Twemlow DP9

Photograph 1 : Ditch in January 2019.

Photograph 2 : Ditch in Summer.

Area-based Units - RETAINED

Before Works *(Baseline)*					
Ref	Phase 1 Habitat	Distinctiveness *Band*	Condition *Rating*	Area of Habitat *Hectares*	Biodiversity Units
Project Total				4.280	20.760
1	A1.1.2 : Woodland : Broadleaved - plantation (Medium)	Medium	Poor	0.320	1.280
2	A1.3.2 : Woodland : Mixed - plantation	Medium	Poor	0.780	3.120
3	A3.1 : Parkland/scattered trees : Broadleaved (Medium)	Medium	Poor	0.390	1.560
6	G1.1 : Standing water : Eutrophic (High)	High	Moderate	0.890	10.680
7	J1.2 : Cultivated/disturbed land : Amenity grassland	Low	Poor	1.740	3.480
6					
7					
8					
9					
10					

Total Biodiversity Units
Post Development
20.760

Area-based Units - CREATED

Before Works (Baseline)						Action (During Works)			
						Hectares of habitat		Biodiversity Units	
Ref	Phase 1 Habitat	Distinctiveness *Band*	Condition *Rating*	Area of Habitat *Hectares*	Biodiversity Units	*Retained*	*Removed*	*Retained*	*Removed*
Project Total				11.360	29.080	0.000	11.360	0.000	29.080
1	A1.1.2 : Woodland : Broadleaved - plantation (Medium)	Medium	Poor	0.380	1.520	0.000	0.380	0.000	1.520
2	A1.3.2 : Woodland : Mixed - plantation	Medium	Poor	0.430	1.720	0.000	0.430	0.000	1.720
3	A2.1 : Scrub : Dense/continuous	Medium	Poor	0.010	0.040	0.000	0.010	0.000	0.040
4	A3.1 : Parkland/scattered trees : Broadleaved (Medium)	Medium	Poor	0.630	2.520	0.000	0.630	0.000	2.520
5	A3.2 : Parkland/scattered trees : Coniferous (Medium)	Medium	Poor	0.020	0.080	0.000	0.020	0.000	0.080
6	A3.3 : Parkland/scattered trees : Mixed (Medium)	Medium	Poor	0.300	1.200	0.000	0.300	0.000	1.200
7	B2.2 : Neutral grassland : semi-improved	Medium	Poor	0.460	1.840	0.000	0.460	0.000	1.840
8	B6 : Poor semi-improved grassland	Low	Poor	0.420	0.840	0.000	0.420	0.000	0.840
9	G1.1 : Standing water : Eutrophic (High)	High	Moderate	0.190	2.280	0.000	0.190	0.000	2.280
10	J1.2 : Cultivated/disturbed land : Amenity grassland	Low	Poor	8.230	16.460	0.000	8.230	0.000	16.460
11	J1.3 : Cultivated/disturbed land : Ephemeral/short perennial (Low)	Low	Poor	0.010	0.020	0.000	0.010	0.000	0.020
12	J1.4 : Cultivated/disturbed land : Introduced shrub	Low	Poor	0.150	0.300	0.000	0.150	0.000	0.300
13	J4 : Bare ground	Low	Poor	0.010	0.020	0.000	0.010	0.000	0.020
14	J5 : Other habitat (Low)	Low	Poor	0.120	0.240	0.000	0.120	0.000	0.240

After work actions (Following Action)								
Ref	Phase 1 Habitat	After work action	Distinctiveness *Band*	Target Condition *Rating*	Area of Habitat *Hectares*	Difficulty to Create *Difficulty*	Time to target condition *Years*	Biodiversity Units Retained / Created
Project Total					11.260			31.074
1	A1.1.2 : Woodland : Broadleaved - plantation (Medium)	Create	Medium	Good	2.180	Low	16-20	13.080
2	A1.3.2 : Woodland : Mixed - plantation	Create	Medium	Good	0.230	Low	16-20	1.380
3	A2.1 : Scrub : Dense/continuous	Create	Medium	Good	0.480	Low	3-5	4.781
4	A3.1 : Parkland/scattered trees : Broadleaved (Medium)	Create	Medium	Good	0.070	Low	16-20	0.420
5	B2.2 : Neutral grassland : semi-improved	Create	Medium	Good	0.580	Low	6-10	4.942
6	B5 : Marsh/marshy grassland (High)	Create	High	Moderate	0.630	High	6-10	1.771
7	G1.1 : Standing water : Eutrophic (High)	Create	High	Good	0.200	Low	<1	3.600
8	J1.2 : Cultivated/disturbed land : Amenity grassland	Create	Low	Poor	0.430	Low	2	0.800
9	J3.6 : Built-up areas : Buildings	Create	N/A	N/A	6.310	N/A	N/A	0.000
10	J4 : Bare ground	Create	Low	Poor	0.150	Low	<1	0.300
11								
12								
13								
14								

Total Biodiversity Units
Post Development
31.074

Total Units Gained / Lost
1.994

Percentage Change (%)
106.9

Area-based Units - ENHANCED

Before Works (Baseline)						Action (During Works)			
Ref	Phase 1 Habitat	Distinctiveness	Condition	Area of Habitat	Biodiversity Units	Hectares of habitat		Biodiversity Units	
		Band	*Rating*	*Hectares*		*Retained*	*Removed*	*Retained*	*Removed*
Project Total				2.7500	6.0200	2.7500	0.0000	6.0200	0.0000
1	A1.3.2 : Woodland : Mixed - plantation	Medium	Poor	0.0100	0.0400	0.0100	0.0000	0.0400	0.0000
2	A3.1 : Parkland/scattered trees : Broadleaved (Medium)	Medium	Poor	0.0300	0.1200	0.0300	0.0000	0.1200	0.0000
3	A1.1.1 : Woodland : Broadleaved - semi-natural (Medium)	Medium	Poor	0.1500	0.6000	0.1500	0.0000	0.6000	0.0000
4	A2.1 : Scrub : Dense/continuous	Medium	Poor	0.0200	0.0800	0.0200	0.0000	0.0800	0.0000
5	A3.2 : Parkland/scattered trees : Coniferous (Medium)	Medium	Poor	0.0500	0.2000	0.0500	0.0000	0.2000	0.0000
6	B6 : Poor semi-improved grassland	Low	Poor	0.0100	0.0200	0.0100	0.0000	0.0200	0.0000
7	J1.2 : Cultivated/disturbed land : Amenity grassland	Low	Poor	2.4800	4.9600	2.4800	0.0000	4.9600	0.0000
8									
9									
10									

After work actions (Following Action)										Total Biodiversity Units
Ref	Phase 1 Habitat	After work action	Target Distinctiveness	Target Condition	Enhanced Area of Habitat	Difficulty to Create	Time to target condition	Spatial Risk	Biodiversity Units Enhanced	Post Development
			Band	*Rating*	*Hectares*	*Difficulty*	*Years*	*Location*		
Project Total					2.7500				19.1558	25.1758
1	A1.1.2 : Woodland : Broadleaved - plantation (Medium)	Enhanced	Medium	Good	0.0100	Low	6-10	Inside	0.0568	
2	A1.1.2 : Woodland : Broadleaved - plantation (Medium)	Enhanced	Medium	Good	0.0300	Low	6-10	Inside	0.1704	Total Units Gained / Lost
3	A1.3.2 : Woodland : Mixed - plantation	Enhanced	Medium	Good	0.1500	Low	6-10	Inside	0.8520	
4	A1.3.2 : Woodland : Mixed - plantation	Enhanced	Medium	Good	0.0200	Low	6-10	Inside	0.1136	
5	A3.1 : Parkland/scattered trees : Broadleaved (Medium)	Enhanced	Medium	Good	0.0500	Low	6-10	Inside	0.2840	19.1558
6	B2.2 : Neutral grassland : semi-improved	Enhanced	Medium	Good	0.0100	Low	6-10	Inside	0.0710	
7	B2.2 : Neutral grassland : semi-improved	Enhanced	Medium	Good	2.4800	Low	6-10	Inside	17.6080	Percentage Change (%)
8										
9										
10										418.2

Hedgerow Linear Units

Before Works *(Baseline)*					Action *(During Works)*			
Ref	Phase 1 Habitat	Condition *Rating*	Length of Linear Habitat *Metres*	Linear Units	Length of habitat (m) *Retained*	Length of habitat (m) *Removed*	Linear Units *Retained*	Linear Units *Removed*
Project Total			182	546	124	58	372	174
1	J2.1.1 : Boundaries : Hedges - Intact - native species-rich	Good	116	347	116	0	347	0
2								
3	J2.1.2 : Boundaries : Hedges - Intact - species-poor	Good	58	174	0	58	0	174
4	J2.3.1 : Boundaries : Hedges - With trees - native species-rich	Good	9	26	9	0	26	0
5								
6								
7								
8								
9								
10								

After work actions *(Following Action)*					Total Linear Units
Ref	Phase 1 Habitat	After work action	Length of Linear Habitat *Metres*	Linear Units Retained / Created	Post Development
Project Total			937	1185	1185
1	J2.1.1 : Boundaries : Hedges - Intact - native species-rich	Retained	116	347	
2	J2.1.1 : Boundaries : Hedges - Intact - native species-rich	Create	521	521	Total Units Gained / Lost
3	J2.1.2 : Boundaries : Hedges - Intact - species-poor	Create	42	42	639
4	J2.3.1 : Boundaries : Hedges - With trees - native species-rich	Retained	9	26	
5	J2.3.1 : Boundaries : Hedges - With trees - native species-rich	Create	135	135	Percentage Change (%)
6	J2.3.2 : Boundaries : Hedges - With trees - species-poor (High)	Create	116	116	216.9
7					
8					
9					
10					