

From: [Charlotte Watkins](#)
To: [Bob Neville](#)
Subject: RE: Consultation response 19/01601/OUT
Date: 30 October 2019 11:24:24

Ref.: 19/01601/OUT

Address: The Beeches, Heyford Road, Steeple Aston

Proposal: Erection of up to 8 dwellings with all matters reserved except the means of access on to Heyford Road.

Bob

Apologies for the late comments on this one. I have had a look at the documentation. The bat surveys have been carried out and have not found bats to be a constraint on site. The recommendations within the bat assessment report and the ecological appraisal as regards protection of protected species and retained habitats are fine. A CEMP for biodiversity would be needed with Ecological protection zones clearly marked. The suggested enhancements such as bat and bird provisions are also appropriate, as are the rest of the points in Section 5 of the Ecological Assessment. CDC aims for a minimum of the equivalent of one bird or bat provision per dwelling to be integrated within any new building and this should be included. Any boundary treatments must be permeable to wildlife (hedges, post and rail or if close board fencing must contain hedgehog highways at regular points). These could be within a LEMP or separate enhancement scheme. I was not clear on who or how the buffered and fenced areas of the most valuable vegetation would be managed long term. This would need to be clearly stated within any LEMP.

The habitats on site are of relatively high ecological value and whilst some is proposed to be retained the Ecological appraisal only appears to aim for 'no net loss' on site and **does not mention a net gain**. In comments on the previous withdrawn application at this site the need for a Biodiversity Impact Assessment calculation metric was noted in order to help assess if an overall net gain for biodiversity, as required by local policy, was achievable on site. This has not been carried out making assessment difficult. CDC recently agreed to work with guidance requiring a minimum of 10% net gain for biodiversity from developments. I do not think this is achieved with the current illustrative layout and am not convinced it could be with the housing proposed. If left to conditions the applicant would need to be prepared to demonstrate, pre-commencement, that this will be achieved on site or, as a last resort, by provision of off site habitat creation up to the appropriate number units and show how this would be managed long term in order to make the development acceptable.

Kind regards

Charlotte

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