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Dear Clare

RE Land Adjacent to Promised Land Farm, Application No: 19/01740/HYBRID and the linked application 19/01746/OUT

I am writing on behalf of Banbury Ornithological Society. Founded in 1952, the Banbury Ornithological Society (BOS) studies the bird life in the twelve 10km squares surrounding Banbury which includes parts of Northamptonshire, Oxfordshire and Warwickshire (see [BOS area map](#)). Fieldwork is the core of BOS activity but the Society also holds regular monthly meetings, publishes a monthly Newsletter and Annual Reports, manages seven nature reserves and is proactive in local conservation matters.

Thank you for informing us of this planning application and inviting our comments.

As noted in the Environmental Statement, BOS has had two meetings with the developer and their representatives to discuss these plans, share our knowledge of the ecology of the local area and to input to the development of the "Conservation Zone" concept (ref. ES section 7.6.41). We have a particular interest in this application because our Bicester Wetland Nature Reserve is adjacent to the development site, which we manage in partnership with Thames Water.

Whilst we regret the loss of greenfield land of significant local nature conservation value, we recognise that the applicant has designed a scheme that is expected to deliver a net gain by creating greatly enhanced wetland, scrub and grassland habitats alongside the Langford Brook, an important wildlife habitat and ecological corridor. We are supportive of this approach and consider that the scheme illustrating the Conservation Zone on Page 32 of ES Chapter 7 is a good initial concept.

We have three specific comments on the Conservation Zone proposal:

1. It is important that the habitat is designed to be part of the established grazing system (that also includes most of the Bicester Wetland Reserve) managed from Promised Land Farm. This will enable the land to be managed simply and sustainably with local livestock to achieve the optimal wet grassland conditions for wetland wildlife, especially waterbirds.
2. Rather than planting scrub and reeds in the larger southern field, we would advise focussing on creating flower rich grassland around the shallow pools and confine any scrub planting to the field corners. This will make the wetland more suitable to wildfowl and waders that require good visibility. Reed planting would be better focussed on the smaller northern field, possibly in combination with excluding the livestock at times as cattle will rapidly graze the reeds.
3. The line of fine willow pollards that run alongside the Langford Brook have not generally been pollarded for many years. They are a very important ecological feature and provide habitat for numerous species as well as being of historical and landscape value. The long-term management of the willow pollards need to be included within the management plan for the Conservation Zone and funds provided for their management on a long-term basis.

We also have three observations and comments on the details of the ES Chapter 7:

1. Regarding reptiles and amphibians, it should be noted that both Great Crested Newt and Grass Snake have been recorded at the Bicester Wetland Reserve in recent years and it can be expected that the newly created wet grassland habitat will provide good habitat for them.
2. The grassland field adjacent to the access track to the nature reserve and sewage treatment works is one of the two fields classified as Improved grassland (Plot 3). We have observed that part of this field (the north-west portion) might justify classification as semi-improved as there are patches of Yellow Rattle and a more diverse floristic value than in the rest of the field. This part of the field is where the health and racquets club is proposed to be built. A brief walkover by a local botanist in June 2017 identified a number of indicators of semi-improved grassland were there, such as Meadow Buttercup, Yellow Rattle, Meadow Barley, Bird's-foot Trefoil, Meadow Vetchling and Oxeye Daisy. A single Bee Orchid was also identified. This field is also regularly used by feeding birds, especially Green Woodpeckers and Mistle Thrushes, joined in winter by flocks of Fieldfare and Redwing. Up to 6 Grey Herons and 35 Meadow Pipits have also been recorded feeding in this field. This indicates the presence of a significant invertebrate biomass, especially earthworms.

3. BOS has discussed with the developer the potential for the long term-management of the Conservation Zone as an addition to the existing Bicester Wetland Reserve. We are interested in exploring this suggestion with the developer. Whoever takes on the land will require sufficient financial provision to ensure the habitats created are properly established over a period of several years and then to carry out annual management (including organising grazing), and site maintenance - e.g. dealing with fallen branches, mowing invasive rush, fencing repairs etc. Periodically there will need to be larger capital spend on pollarding the willows and replacing the fence infrastructure.

I hope these comments and observations are helpful in consideration of this planning application.

Yours sincerely

Mike Pollard

Conservation Officer

Banbury Ornithological Society