Rebekah Morgan

From: Charlotte Watkins
Sent: 09 June 2020 23:55
To: Rebekah Morgan

Subject: RE: Bicester Heritage - FAST application (19/02708/OUT)

Rebekah

The submitted ecological information for the above application is fine and appropriate in scope and depth. Additions to the ecological information were agreed at the pre-application stage and these have all been included. In terms of impacts on protected species I have no particular concerns here. Avoidance of harm should be possible through a conditioned CEMP, lighting strategy and the proposed habitat creations. Enhancements on site including integrated provisions for bats and birds are proposed and will also be beneficial.

The site is part of the Local Wildlife Site some of which will be lost to this development. The applicants have submitted a Biodiversity Impact Calculator which shows that despite the proposed habitat creation on site and enhanced management of areas of grassland there would be an overall net loss in habitat value on site. A cover note is included which outlines some of the specific circumstances on this site which make it more difficult to achieve a no net loss score through the use of a metric. I have no argument with much of this and the points made are all valid. Metrics are a tool to help assess overall biodiversity loss and gain and it is known that there are exceptions such as scrub removal/grassland management which may not be taken into account. I would conclude from this that long term a net loss is likely to be avoided here.

I am less sure however how much of a net *gain* would be achievable on this particular site with these proposals. We currently aim to seek net gains from developments in the region of 10% of original biodiversity value but certainly require demonstration of clear and meaningful levels of net gain.

The Ecological report states that green roofs will be sought on all FAST buildings but it is not clear if this is likely to occur. Green roofs have been left out of the Biodiversity Impact Assessment (whereas if included these could give a greater score). I wonder therefore if these are likely or feasible to be included?

I would recommend that ideally a small area of additional land is included in the site to allow more flexibility to demonstrate a clear net gain on site with additional habitat creation or enhancement.

Please do get back to me to discuss any of this further.

Kind regards Charlotte

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My usual working hours are: Monday and Wednesday mornings.

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