

**From:** Charlotte Watkins <[Charlotte.Watkins@Cherwell-DC.gov.uk](mailto:Charlotte.Watkins@Cherwell-DC.gov.uk)>

**Sent:** 28 June 2021 18:39

**To:** George Smith <[George.Smith@Cherwell-DC.gov.uk](mailto:George.Smith@Cherwell-DC.gov.uk)>

**Subject:** 21/00517/F Wroxton MX track

George

I have looked at the ecological enhancement measures proposals, updated GCN survey and additional information sent to me and will therefore comment further.

Firstly the Site is partially within the Northern Valleys Conservation Target Area. Under Local policy ESD11 *Development which would prevent the aims of a Conservation Target Area being achieved will not be permitted. Where there is potential for development, the design and layout of the development, planning conditions or obligations will be used to secure biodiversity enhancement to help achieve the aims of the Conservation Target Area.* The specific aims and Oxfordshire Biodiversity Action Plan Targets associated with this CTA are: 1. Limestone (lowland calcareous) grassland - management and restoration (and survey). 2. Lowland dry acid grassland - management and restoration (and survey). 3. Lowland meadows - management and restoration (and survey). 4. Fen (and swamp) – management. I am not convinced that the placement of a motocross track within it helps meet the aims of the CTA and it should be demonstrated how this policy is met.

Is the new enhancement scheme to replace the Landscaping scheme of Jan 2021? It does not specify.. If these are to be looked at in tandem then I would have the following comments on the **landscaping scheme:**

4.2 refers to wildflower meadow establishment but seems confused as to the type of meadow aimed for referring to sufficient nutrients etc.. It is not clear how the site has been previously managed but soil stripping may be required if it has been long term pasture.

6.2 – pasted from the wrong report and needs to be removed as doesn't make sense.

9.3 – again doesn't make sense. If a fence is proposed to protected hedge from grazing this should be made clear.

10.1 – spraying with herbicides under the hedgerow will not aid the development of a floristically rich understorey and so this needs to be changed to match with the new proposals.

11.1. As previously outlined a wildflower meadow is very unlikely to be successful within a very intensively used campsite with large vehicles, fumes from racing and trampling from spectators.

11.2 grassland categorisation does not make sense – does this result from a botanical survey? Is the soil type and condition compatible with this and what condition will be achieved. Dry acid grassland would potentially be appropriate here. The choice of seeding needs to be based on something.

12.2 This mentions that protection is needed from additional excavation. Is more excavation planned? Is the track proposed to get bigger and if so how will this fit in with the ecological mitigation and enhancement plans? And if this is ongoing track maintenance that is being referred to as excavation - are they proposing that this protective fencing is permanent?

The original landscaping plan is confused and not really coherent and if it is not fully replaced by a further document it would be very difficult to work to. It needs to be rewritten so it is clear and fits in with the Ecological enhancement plan now produced.

#### **The Ecological enhancement scheme June 2021:**

The additional hedgerow proposed to be planted is acceptable in terms of species. There is nothing on ongoing management in terms of frequency of cutting and height. In order to ensure there is a chance of the hedgerow being a successful habitat and in particular the proposed floristically rich margins there will need to be installation of some sort of (wildlife permeable) fence or knee rail to ensure there is no walking or driving/parking close to the hedge or within the margin proposed. 3-

4m (and it doesn't say which – it should because an extra metre along this length of hedgerow would dramatically change the net gain achieved) is too narrow to ensure the hedgerow is fit for use by wildlife. With vehicles parked as close as this or potentially earthworks and large machinery this close the hedgerow roots would be impacted. A buffer of 10m to the hedgerow should be maintained where possible. The tree officer could advise further on this also.

We need a copy of the actual Biodiversity Impact metric to be sent over as I cannot tell what condition they are aiming for in their newly created habitats and the time scale until achievement. It is difficult to assess whether this net gain is realistic without it.

Whilst this document is not proposed as a LEMP unless a further LEMP is to be conditioned then management for at least 25 years needs to be outlined with reviews by an ecologist at various intervals to ensure the created habitats are working and further degradation of retained habitats is not occurring. Changes to the management plan should be agreed with the LPA.

The landscape scheme mentions light grazing by sheep will occur. Is this also in the margins? How does this fit in with their management? Or will these be fenced off?

It is unclear from the metric data supplied whether they count the areas to be camped on with camper vans and parking for vehicles/trailers as G4 modified grassland or whether these areas are counted as lost (which they probably should given the weight of traffic to be regularly on it?)

At least one of the areas proposed for small scale woodland creation appears to be on a very steep slope surrounded by track and skid marks. I am not convinced that this would be very successful for trees to survive or reach their natural size in terms of root protection zones? Again I would advise checking with the tree officer or landscape officer as to the likely success of this choice of site but I doubt anything beyond poor condition could be achieved.

### **Great Crested Newt Mitigation Scheme**

It seems that Great Crested Newts are using one of the ponds which is surrounded by track on all sides. A population survey has not been carried out so we do not know what population size is present or whether it forms part of a meta-population with other ponds in the area (although these came back negative).

The mitigation plan shows significant grassland around the TN6 pond however other aerial photos I have been sent suggest the track comes right up to the edge of the pond (see below). I think there would need to be some sort of rail or delineation to ensure that vehicles/bikes do not stray this close to the pond. The mitigation gives a significant number of steps which will be required in order to ensure no offence occurs. These may need to be written in a clearer format to ensure there are no issues with other aspects of their scheme. For example I understood these ponds to be part of a scheme to trap silt? Will it be possible for them to only do any works on them in November? Run off into the pond known to contain GCN will also need to be prevented. I'm just trying to check that it all adds up across the site. Mitigatory works would need to be in place before anything else happens on site. Note that all use of the track and movement within habitat likely to be used by Newts needs to cease before dusk. All activity on site should anyway cease on site before dusk because of the detrimental impacts on roosting birds and bats. Strict time limits on activity, noise and lighting will limit some of the impacts on wildlife to some degree.

Whilst I can see the mitigation scheme has devised a number of good suggestions in terms of working with what they have I feel the chance of GCN being harmed at the individual level is fairly high with bikes racing within metres of the pond on a much more regular basis than to date. I would suggest that they consider obtaining a licence to effectively 'destroy' the ponds capability to support newts and accept the greater mitigation that needs to go with this. I cannot see that a favourable conservation status for the population in the pond can be maintained long term with the number of race days and camping proposed or with regular run off into the pond from the spraying of the track and exposed earth. I would recommend gaining an updated response from Nature Space or Natural England on this. Otherwise I feel there is a danger of either regular offences or racing needing to be

stopped regularly whenever a GCN is sighted (and that's if their presence is noticed which seems unlikely). I am uncomfortable with the 'reasonable avoidance measures' path in this case now that we know GCN are actually on site within the track circuit. If this system is used then regular reviews by a licensed ecologist will be needed to ensure that the created habitats function and that all avoidance measures are being carried out as written.



Please get back to me with any queries.  
Kind regards  
Charlotte

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My usual working hours are: Monday and Wednesday mornings.

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