

Wroxton Motocross Application 21/00517/F

Dear Nat

Thank you for sending on the ecologists responses to my comments and the biodiversity net gain calculations.

There are some landscaping issues remaining and I would hope these can be resolved within an agreed LEMP. The biodiversity metric submitted is generally fine however it does not include the current ponds in the baseline habitats and I think is proposing that the ephemeral patches of grass in between the track will be enhanced to dry acid grassland of good condition? Which seems unlikely? (– if I have this confused then please do correct me). If carried out as written it would demonstrate a reasonable net gain is possible although this will heavily depend on the management of the habitats and operational procedures employed on site including the level of usage by vehicles, dealing with waste and run-off all of which should be within a pre-commencement LEMP. Any LEMP should include monitoring to ensure there are regular checks by an ecologist so adjustments can be made to management of habitats as required. Where habitats do not reach the proposed condition there may need to be additional measures taken in the future to ensure a good net gain is reached.

My concern is the feasibility of what they propose. Even with the current level of usage of the track aerial photography shows the track and earthworks extend well into the area they propose to now be heathland, grassland and tree planting. The ponds on site also look very squeezed when the track is looked at in its current reality. Once the usage is increased significantly I think they will find it very difficult to create and retain the habitats they propose in these areas (see comparison below of intention and how the track looks in our latest AP information).

With regard to the GCN mitigation, I understand the intentions is to try to retain the current population of GCN within the middle pond within the track site and include on site mitigation in the form of ponds towards the woods. The ecologists comments suggest that a barrier might be used to ensure there is no spray etc.. going into the pond given the track runs right up to it.

'There is ephemeral/ ruderal vegetation on the bank along the southern side of the pond. The track does indeed pass quite close to the northern side of the pond and it would be beneficial to have a barrier alongside which would not only help prevent riders going too close to the margin, but also prevent sediment flung up by the bikes entering the water'.

I am not sure what type of barrier is intended? It was also my understanding that this pond was designed to be a silt trap and therefore presumably there will need to be constant sediment run off from the track into this pond which is likely to contain elements of fuel, tyre wear and spray as bikes go round the corner. I cannot concur that this will not in anyway impact the aquatic habitat of the great crested newts found to be present during the eDNA survey and could certainly be said to impact the terrestrial habitat within 50m of the pond. I would still therefore strongly advise checking with Natural England licensing department that they are in full agreement that this is not an activity which needs licensing. I would then be happy to stand corrected and go with NE's decision.

Kind regards

Charlotte

Dr Charlotte Watkins, Ecology Officer

