

Ecology Solutions Limited
Farncombe House
Farncombe Estate
Broadway
Worcestershire
WR12 7LJ

+44(0)1451 870767
info@ecologysolutions.co.uk
www.ecologysolutions.co.uk



7884: BICESTER MOTION (EXPERIENCE QUARTER)

RESPONSE TO MATTERS RAISED BY BIOSCAN LIMITED ON BEHALF OF CPRE

Introduction

1. This Response Note serves to respond to comments raised by Bioscan Limited in their letter dated 25 October 2021. The letter is identified as a *Critique of BNG calculations submitted by Ecology Solutions* in relation to Planning Application 21/01224/OUT.
2. The matters raised by Bioscan are considered in turn in the following Sections of this Note, with additional information provided where appropriate.
3. Whilst not a matter raised in their letter, it is noted the Biodiversity Calculator 'critiqued' by Bioscan was based on a red line boundary which has been amended during the course of the consultation period. For completeness, a revised Biodiversity Calculator is submitted alongside this Response Note, reflecting the revised red line boundary.
4. The amended red line excludes approximately 6.06ha of land that formed part of the previous red line boundary, comprising 4.61ha of scrub and 1.45ha of standing water (this being P1). This is considered further in the 'Revised Red Line Boundary' Section below.
5. As detailed in this Response Note, the approach to Biodiversity Impact Assessment (BIA) is considered robust, has been informed through pre-app discussions with Cherwell District Council's (CDC) Ecologist, and appropriately recognises the significant opportunities for biodiversity net gain to be achieved by the proposals. The proposals can therefore come forward in full compliance with policy and legislation pertaining to biodiversity and nature conservation.

Matters Raised by Bioscan

6. **Belated Submission of Calculator Tool.** In their letter Bioscan express their concern with the 'belated' provision of the Biodiversity Calculator.

7. For clarity, the Biodiversity Impact Assessment (BIA) prepared in support of the proposals was completed in December 2020, and was produced in tandem with other ecological assessment work and reporting undertaken for the Application Site. It is unclear why this BIA was not made available earlier in the planning process.
8. **Choice of Calculator Tool.** Paragraphs 1 to 3 of Bioscan's letter query the use of the Warwickshire Calculator as opposed to the DEFRA Metric V3.0 (released in July 2021), suggesting use of the former is inappropriate.
9. The Warwickshire Calculator is entirely appropriate to use in support of the proposals and, indeed, its use has been discussed and agreed with Charlotte Watkins (Cherwell Ecology Officer) as part of numerous pre-application meetings and discussions.
10. CDC have long accepted either the Warwickshire or DEFRA Calculator tools and when the initial 'masterplan' discussions began in earnest (including pre-app discussions for FAST and BRAND Experience), Cherwell's Ecologist noted her preference for use of the Warwickshire tool on the basis she was more familiar with it.
11. The Warwickshire Calculator was initially used for the now consented FAST proposals (one of the 'Quarters' which form the masterplan vision for the wider site). To ensure consistency between phases, its continued use was also deemed appropriate for the BRAND Experience Quarter. It is not the case that the DEFRA Metric V2.0 superseded the Warwickshire calculator, they are simply alternative tools and were both widely used throughout 2020, up until July 2021.
12. For completeness, the BIAC was undertaken in December 2020, prior to the release of the DEFRA Metric V3.0. When Natural England (NE) released the DEFRA Metric V3.0 metric in July 2021 they expressly noted they do not expect applications in the planning domain to retrospectively apply the DEFRA V3.0 tool. Therefore the approach taken represents the accepted industry standard, in accordance with NE advice, and as approved by CDC's ecologist.
13. It is relevant to note Ecology Solutions are also working on multi-phase schemes in Warwickshire, where Warwickshire Environmental Services (WES) continue to accept (and indeed request) submissions supported by the Warwickshire Calculator. The use of different metric tools is by no means a unique scenario and remains commonplace for pre-existing submissions (i.e. those pre-dating DEFRA V3.0 release) and multi-phase developments.
14. Moreover, Ecology Solutions are also aware of Appeal Decisions that specifically consider the appropriateness of using 'older' Biodiversity Metrics for longstanding applications. This matter was considered at a recent Appeal in North Hertfordshire¹, with the Inspector in that instance noting:

"75. Whilst the accompanying biodiversity metric pre-dates the most recent national technical guidance, it has been prepared over significant time and been reviewed and approved by Hertfordshire Ecology."

¹ Appeal Decision APP/X1925/W/3273701

15. Importantly, there is also no reason to consider one calculator tool is more accurate than another in reflecting real world biodiversity impacts. All biodiversity metrics are designed to support the same objective, this being to infer the likely biodiversity outcome of a proposal (using habitats as a proxy), and to inform professional judgement. The use of either the Warwickshire Calculator or the DEFRA Metric would adequately allow for this objective to be achieved when considered together with the Ecological Assessment submitted in support of the proposals.
16. The importance of professional judgement in interpreting ecological impacts has been detailed in previous submissions associated with this planning application, not least within the supporting note submitted alongside the initial BIA. The matters identified in that note, and the Site specific considerations, remain entirely relevant in considering the opportunities for ecological enhancements to be secured as part of the proposals. Whilst it is not intended to reiterate these matters, Ecology Solutions feel it is important to emphasise the significant ecological benefits that would be realised through securing long-term, biodiversity led management of on-site habitats, relative to a non-development scenario.

Open Mosaic Habitat Creation

17. In their letter, Bioscan raise concerns with the creation of Open Mosaic Habitat (OMH) within the Application Site, identifying their view that this habitat creation would not be readily achievable.
18. Whilst justification on the deliverability of OMH within the Application Site is already detailed within the BIA Cover Note submitted alongside the BIAC, as well as within the Ecological Assessment, for completeness further consideration is given to the matters raised.
19. Firstly, regarding the high distinctiveness categorisation for OMH, the input for distinctiveness selected for the submitted BIA are consistent with the DEFRA Metric V3.0 tool, as otherwise advocated by Bioscan. There is no reason to consider this input as inappropriate. Indeed, the input also allows for an extended 'time to target condition' relative to the DEFRA Metric V3.0 tool, providing for a further precautionary approach.
20. Regarding the creation of this habitat, Bioscan infer OMH is only found on *long-abandoned industrial and minerals sites*. This is simply not the case. OMH, whilst very variable and poorly defined in habitat terms, can be accurately described as supporting a range of early successional habitats including, for example, bare and sparsely vegetated ground, early successional vegetation, herb-rich, short sward grassland, and rough grassland. Each of these habitats can and do establish rapidly in appropriate conditions (such as in nutrient poor or drought stressed soils) even in the absence of targeted creation or management.
21. Noting the Application Site has remained outside of agricultural management for an extensive period (thereby avoiding chemical input), and with regard to the habitats that have colonised the exterior of the airfield, it can be reasonably concluded the soil conditions within the central airfield would be entirely appropriate for OMH creation. This conclusion is further supported by the presence of OMH within the wider site, as is also reflected in the Local Wildlife

Site (LWS) citations for both Bicester Airfield LWS and Stratton Audley Quarry LWS.

22. Noting the above, it is considered OMH could be readily created within the Application Site, as part of the proposals.
23. In their letter, Bioscan suggest if 'high distinctiveness' OMH was capable of being delivered on Site post-development, its presence would be expected as part of the baseline situation.
24. As identified in the Ecological Assessment, areas of early successional habitat are present within the Application Site in the form of recolonising hardstanding. This habitat would be suitable to form a component of a more valuable OMH, if continuous with other suitable (i.e. disturbed and early successional) habitats. However, these small areas are relatively isolated from such habitat, being surrounded by relatively uniform sward calcareous grassland and woodland. Noting this isolation, the area in question is very small (i.e. <0.25ha) and was not deemed to represent OMH as a best fit habitat type.
25. Notwithstanding this position, and to allow a comparison context, a revised calculation has been undertaken within which the habitat is re-categorized as high distinctiveness OMH. For completeness, the change in input increases the value of the habitat from 0.48 to 4.32 units. This represents less than 1% of the overall baseline habitat score.
26. Notwithstanding the above, Ecology Solutions disagree, in principle, with the broader position advocated by Bioscan. It is overly simplistic to contend the presence or not of a habitat in the baseline situation is a direct reflection of the substrate and ground conditions, or indeed the feasibility of a habitat being created. Existing management is a major influencing factor, particularly for OMH which requires regular disturbance to 'reset' ecological succession. Moreover, Bioscan's position ignores the potential for habitat creation to either bring in new materials/substrates or introduce target characteristics such as topographical diversity or wetland, both of which are entirely feasible in this instance.
27. In further attempting to suggest OMH creation is unachievable, Bioscan appear to deliberately focus on a small subset of the overall OMH being proposed as ecology car parks.
28. Notwithstanding that high quality OMH can be delivered alongside car-parking uses (and indeed is an approach advocated to Ecology Solutions by Buglife on other schemes), the vast majority of proposed OMH will be delivered within the central airfield. The large majority of this central area will not be subject to regular or intensive disturbance through operational use, with OMH provision and maintenance to be secured through targeted habitat management in the long-term.
29. It is acknowledged that localised areas proposed as OMH are likely to be subject to relatively higher levels of operational use, such as through car parking or track-edge disturbance. However, this is deemed beneficial in achieving varied disturbance and ground conditions across the wider OMH resource, and would not prevent a suitably varied and valuable habitat mosaic being secured for the Application Site.

30. Again, it is noted CDC's ecologist has reviewed the proposals for OMH provision within the Application Site (as detailed within the Ecological Assessment) and deemed these acceptable and deliverable.

Calcareous Grassland

31. Turning to calcareous grassland; Bioscan raise concerns regarding losses to existing areas of this habitat, suggesting such losses may conflict with local policy.
32. As detailed within the Ecological Assessment, the proposals will allow for a net gain in good quality calcareous grassland within the Application Site, not least through instigating appropriate habitat management within central airfield areas which have been historically subject to intensive mowing regimes. Indeed, an overall increase in high quality calcareous grassland (+1.29ha) is committed to, and has formed a guiding principle for the proposed development (see 5.2.33 to 5.2.41 of the submitted Ecological Assessment).
33. As identified within the Ecological Assessment, the opportunity for quantitative and qualitative gains in species rich grassland represents a significant ecological benefit for the proposals. It would directly complement the adjacent LWS sites, providing valuable supporting habitat which, in time, could form part of an extended LWS designation. The proposals are therefore considered to comply with adopted policy.
34. The opportunity to retain substantial areas of calcareous grassland in good condition in the long-term is a further significant benefit which is not otherwise recognised by the BIA process.
35. Bioscan further raise concerns that the creation of OMH will be to the detriment of existing calcareous grassland, resulting in the grassland being 'replaced'. For clarity, the intention is not that the calcareous grassland will be replaced by OMH *per-se*, rather, calcareous grassland will remain a significant component of the OMH, but will be subject to localised creation and management so as to introduce botanical and structural diversity post-development. Habitat creation and management in this regard will seek to reflect the criteria for OMH as identified within the Priority Habitat definition identified in Table 1 below. Each of these criteria are deemed to be readily achievable.

	Criterion
1.	The area of open mosaic habitat is at least 0.25ha in size.
2.	Known history of disturbance at the site or evidence that soil has been removed or severely modified by previous use(s) of the site. Extraneous materials/substrates such as industrial spoil may have been added.
3.	The site contains some vegetation. This will comprise early successional communities consisting mainly of stress-tolerant species (e.g. indicative of low nutrient status or drought). Early successional communities are composed of (a) annuals, or (b) mosses/liverworts, or (c) lichens, or (d) ruderals, or (e) inundation species, or (f) open grassland, or (g) flower-rich grassland, or (h) heathland.
4.	The site contains unvegetated, loose bare substrate and pools may be present.
5.	The site shows spatial variation, forming a mosaic of one or more of the early successional communities (a)–(h) above (criterion 3) plus bare substrate, within 0.25ha.

Table 1. Criteria for OMH, as defined by Riding et al. (2009)

36. The opportunities to create an increasingly diverse mosaic of habitats within the Application Site is of key importance to the invertebrate assemblages present. As noted within the Ecological Assessment, and notwithstanding its floristic diversity, the semi-improved calcareous grassland present along the northern boundaries of the airfield (where some losses are proposed), are of comparatively poorer value to the invertebrate assemblage supported within the wider area. Indeed, this was noted through the invertebrate surveys undertaken by Colin Plant Associates (Appendix 4 of the Ecological Assessment) who concluded:

“Almost all of these species are confined to the most important parcels of calcareous grassland and OMH, concentrated around the southern perimeter of Bicester Airfield and within Stratton Audley Quarry and corresponding to areas marked as key survey areas in Fig. 1. [provided below] In contrast, the eastern and northern margins do not support areas of OMH and the grassland here presents as more uniform, with less structural variation and consequently of lower interest with regard to invertebrates”.

37. Opportunities to create OMH have therefore been directly informed by the faunal interest of the Site, with the proposals achieving a desirable balance between both increasing the extent of ‘good’ quality calcareous grassland and securing significant increases in OMH to enhance opportunities for invertebrates. This approach therefore represents an opportunity to deliver substantially enhanced opportunities for faunal species (which are ignored in Biodiversity Metrics), whilst also achieving significant biodiversity net gains in habitat terms.
38. Again, following review of the proposals, CDC’s ecologist has raised no concerns in regards impacts on calcareous grassland.

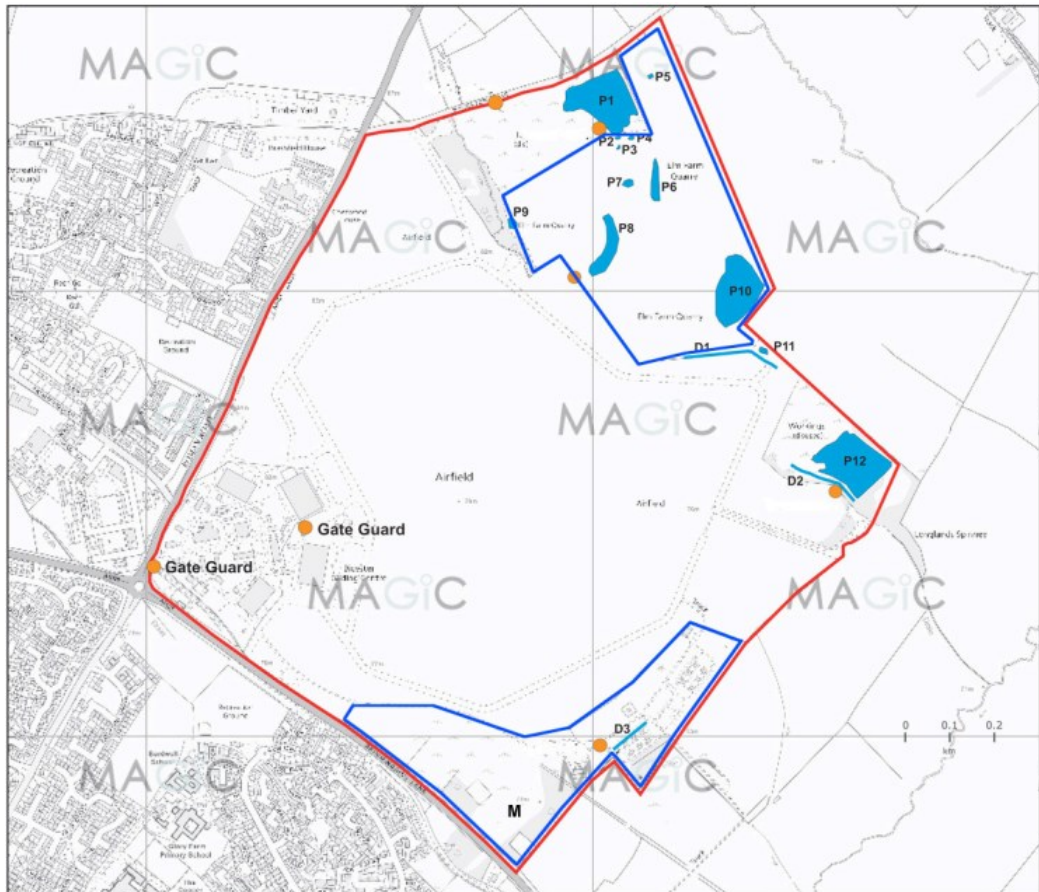


Figure 1. Plan from CPA report identifying the survey area (red line) and key invertebrate (blue line)

Revised Red Line Boundary

39. As detailed in the Introduction Section, the red line boundary of the Application Site has been amended in the intervening period following the completion of the original BIA in December 2020.
40. The land being removed is under the ownership of Oxfordshire County Council (OCC) and is referred to as the OCC land. In total, this measures approximately 6.06ha, of which 4.61ha comprised '*dense continuous scrub*' and 1.45ha comprised '*wetland: standing water*'.
41. The BIA has been updated to reflect this red line change, as well as to include high distinctiveness OMH within the baseline, as per paragraph 25 of this Response Note. The amended BIA is submitted alongside this Note. For ease of review, Table 2 below serves to provide a comparison between the three BIA scenarios relevant to this Note.

	Scheme with OCC Land*	Scheme with OCC Land and OMH included in Baseline	Final Scheme (without OCC Land)
Total Area	91.06ha	91.06ha	85ha
Baseline Habitat Value	575.73	579.57	534.51
Biodiversity Net Gain (Units)	69.62	69.62	63.15
Biodiversity Net Gain (%)	12.1	12.0	11.8
Post Development Habitat Value	645.35	649.19	597.66

**Original BIA prepared in December 2020*

Table 2. Comparison of BIA outputs through three tested scenarios

42. As demonstrated in Table 2, when accounting for the alterations to the BIA, the scheme allows for a positive score proportionately similar (virtually identical) to the original BIA score. The predicted BNG remains in excess of 10%, as sought by CDC.

Summary and Conclusion

43. This Response Note serves to respond to comments raised by Bioscan in their letter dated 25 October 2021.
44. The matters raised by Bioscan have been considered and rebutted in turn, with additional information supplied provided where appropriate. A summary of the primary matters raised are provided below.
45. **Choice of Metric.** The Warwickshire Calculator is entirely appropriate to assess the proposals. Its use has been agreed with CDC's Ecologist through significant discussions over an extended timeframe. Its use is recognised as beneficial to allow comparison between the individual 'quarters' of development, and to guide a masterplan wide net gain, as is a guiding principle for development across the wider Bicester site.
46. The continued use of the Warwickshire tool (and indeed other 'older' metric tools) remains commonplace, and is an approach endorsed as appropriate by NE. This position is further supported through recent Appeal Decisions. Importantly, there is no reason to consider either the Warwick or DEFRA tools would be more accurate in reflecting real world biodiversity impacts. All biodiversity metrics are designed to support the same objective, this being to infer the likely biodiversity outcome of a proposal (using habitats as a proxy), and to inform professional judgement. The use of the Warwickshire Calculator adequately allows for this objective to be achieved when considered together with the Ecological Assessment submitted in support of the proposals.
47. **Creation of Open Mosaic Habitat.** The creation of OMH within the Site is entirely justifiable. The combination of early successional habitats which form OMH can be readily recreated in short periods of time where appropriate conditions exist.

Noting the presence of OMH within the wider site, it is reasonable to conclude appropriate conditions exist within the Application Site.

48. The appropriateness of creating this habitat within the Application Site is supported and guided by the findings of extensive invertebrate survey work, with this identifying the relative importance of structurally varied grassland (with OMH characteristics) relative to areas of structurally uniform calcareous grassland. The proposals have been designed to achieve a desirable balance between both increasing the extent of 'good' quality calcareous grassland, and securing significant increases in OMH to enhance opportunities for regionally significant invertebrate assemblages.
49. Regarding calculator inputs, the identification of this habitat as 'high' distinctiveness is consistent with the latest DEFRA Metric. There is no reason to consider this input as inappropriate.
50. **Calcareous Grassland.** The proposals will allow for a net gain in good quality calcareous grassland within the Application Site, not least through instigating appropriate habitat management within central airfield areas which have been historically subject to intensive mowing regimes. Indeed, an overall increase in high quality calcareous grassland (+1.29ha) is committed to, and has formed a guiding principle for the proposed development.
51. The proposals to deliver extensive OMH within the central airfield will ensure calcareous grassland will remain a significant component of the resource, but it will be subject to localised creation and management so as to introduce botanical and structural diversity post-development. This will enhance opportunities for faunal species.
52. The opportunity to retain substantial areas of calcareous grassland in good condition in the long-term is also a significant benefit which is not otherwise recognised by the BIA process.
53. **Summary.** In summary and contrary to the views expressed by Bioscan, the approach to Biodiversity Impact Assessment (BIA) is considered robust, has been informed through pre-app discussions with CDC's Ecologist, and appropriately recognises the significant opportunities for biodiversity net gain to be achieved by the proposals. The proposals can therefore come forward in full compliance with policy and legislation pertaining to biodiversity and nature conservation.