

From: Charlotte Watkins
Sent: 19 November 2021 01:20
To: Rebekah Morgan
Subject: RE: Bicester Motion 21/01224/OUT - further response re BNG calculations

Rebekah

Further comments to address your points and the CPREs response to ES response:

The changing of the red line of the application has made it feel a little muddled in terms of assessing impacts and meant that a new metric has been submitted later. I am not sure why we didn't receive the original metric up front but it was sent promptly when requested. This is a relatively complicated site to assess due to trying to marry up the overall masterplan and the outline applications coming in in sequence which do not yet contain the detail to guarantee the deliverability of mitigation and net gain. I can understand why it is not easily understandable to third parties but also note that this has now been followed up with updates and an explanatory response from the developers ecologists.

As regards the use of the Warwickshire metric, I do not believe there is anything underhand here in the choice of the use of this metric – it is just a result of how we first began to use metrics at CDC under guidance from David Lowe at WCC. The habitat assessments for this application were made some time ago before DEFRA metric 3.0 was an option. Having spoken to the developers ecologist they have confirmed their intention to use DEFRA 3.0 in future applications, potentially alongside the Warwickshire metric for comparison with previous calculations. I do not have an issue with this and understand that it would be difficult to rerun the calculations here with a new metric now as habitat assessments were made with the Warwickshire one in mind. The masterplan could be rerun at a later date however with DEFRA 3.0 to provide clarity and I would advise this.

The proposals involve the loss of calcareous grassland and part of the LWS. I am not sure a proper assessment as to why this is unavoidable has been presented with this ecological appraisal. Usually loss of habitat of high distinctiveness, if unavoidable, should be replaced like for like in terms of area and condition (this is highlighted by the error messages within the metric referred to by Bioscan). This is not proposed here. Instead they plan to improve the condition of the current grassland and also allow areas of Open Mosaic Habitat to develop as mitigation and enhancement and to achieve biodiversity unit gains.

This could lead to an overall greater ecological value across the wider (masterplan) site over time but it is hard to tell if this is achievable until we have reviewed a robust biodiversity management plan for this site.

It seems unlikely to me however that this particular part of the LWS would retain its current LWS designation under these proposals.

I have discussed the use of ecology carparks with Ecology Solutions and can understand that these are of course preferable, ecologically, to hard standing. Whether they will become important habitats for invertebrates in their own right, even with graduated use as proposed, is still something I am unsure of however I understand that they represent only a part of the OMH proposed.

CPRE requests an onsite meeting to discuss habitat condition, classification and distinctiveness. I am not sure if they are suggesting that we do this at this time of year? I am happy to facilitate meeting at some point if all parties feel this would be helpful. Though it is unlikely to affect the proposals so may not add much to assessment specifically at this stage.

Kind regards
Charlotte

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