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7884: BICESTER MOTION (EXPERIENCE QUARTER)

RESPONSE TO MATTERS RAISED BY CHERWELL DISTRICT COUNCIL'S ECOLOGY OFFICER

Introduction

1. This Response Note serves to respond to the further consultation response provided by the Cherwell District Council (CDC) Ecology Officer, dated 19 November 2021. The response from the CDC Ecology Officer followed the submission of previous Response Notes by Ecology Solutions responding to matters raised by Bioscan.
2. Prior to preparation of the current Response Note, Ecology Solutions liaised with CDC officers (including the Ecology Officer) on 25 November 2021, to further understand the basis of her remaining concerns, and discuss what additional information may be required to address these concerns.
3. Following these further discussions, and with regard to CDC Ecology Officer's written response dated 19 November 2021, outstanding matters are considered be limited to the following:
 - Further justification as to the proposed losses of calcareous grassland and Local Wildlife Site (LWS) habitat.
 - Uncertainty on the success of proposed habitat enhancement/creation in the absence of further details on management.
4. For completeness, CDC's Ecology Officer confirmed her view that the Biodiversity Metric submitted for the Site is robust, and appropriate to inform the planning application and identify opportunities for Biodiversity Net Gains (BNG) to be achieved.
5. The matters raised by the CDC Ecology Officer are considered in turn in the following Sections of this Note, with additional information provided where appropriate.

Further justification as to the proposed losses of calcareous grassland and Local Wildlife Site (LWS) habitat

6. The written response provided by the CDC Ecology Officer requested further assessment be presented to justify losses to calcareous grassland and LWS habitat. Following further liaison between CDC and Ecology Solutions it was further clarified that CDC would welcome justification on both the 'planning need', as well as justification of the appropriateness of habitat mitigation measures.
7. **Policy Position.** Local planning policy effectively outlines a two stage test when considering the potential for harm to arise either on the [Bicester Airfield] LWS or habitats of potentially heightened ecological value (such as calcareous grassland). Of particular relevance, Policy ESD 10 states (underline our emphasis):

"Development which would result in damage to or loss of a site of biodiversity or geological value of regional or local importance including habitats of species of principal importance for biodiversity will not be permitted unless the benefits of the development clearly outweigh the harm it would cause to the site, and the loss can be mitigated to achieve a net gain in biodiversity/geodiversity."
8. It is therefore appropriate to consider each 'stage' of the test in turn, as undertaken below.
9. **Planning Benefit (Need).** The need for development at the Site is recognised through policy, with the Site allocated for heritage tourism uses, leisure, recreation, employment and community uses through *Policy Bicester 8: Former RAF Bicester*. This policy recognises the need for appropriate development to come forward such that an economically viable future for the wider Site may be secured. The principle for development within the Site, and the benefits which may be delivered, are therefore understood to be accepted by CDC.
10. The scale, quantum and form of development has been informed through a robust understanding of the sites opportunities and constraints and multi-disciplinary engagement with CDC, including a series of Pre-App' meetings leading up to the planning submission.
11. Regarding the siting of proposed built form, multiple masterplan iterations were considered, with these seeking to balance various constraints at the Site, in particular for heritage and landscape.
12. Whilst, from a purely ecological perspective, development within the perimeter track (i.e. which supports grassland of comparatively low value) would be preferable, these areas were highly constrained from a heritage and landscape perspective. With regard to planning balance, it was therefore identified that development would need to be primarily sited within periphery areas of the Site, i.e. where 'good' condition calcareous grassland is present. Again, this position is understood to be agreed with CDC. As such, losses to calcareous grassland are assessed as being unavoidable when seeking to deliver the development sought through Policy Bicester 8.
13. It is relevant to note that the proposed development will deliver a number of public benefits, including:

- The proposal will contribute to the delivery of the Council’s objectives including sustainable economic growth;
 - Contribute to achieving a long-term commercially successful future for the wider site;
 - Contribute to repurposing the perimeter track and finding a new and long-term sustainable use for the airfield;
 - Deliver substantial economic benefits to the town of Bicester and wider district;
 - Provide public access to an otherwise closed and inaccessible site enabling understanding of this historic area;
 - Develop an underutilised Previously Developed Site; and
 - Deliver heritage benefits (which are public benefits) associated with the proposal.
14. In summary, the planning need and benefits are substantiated through Policy Bicester 8 and have further been tested through extensive engagement with CDC, amongst other consultees. Engagement with CDC has included for discussion and agreement on various ecological principles, with the potential for ecological harm to arise (in the absence of mitigation) detailed and quantified through the planning submission.
15. With regard to the multi-disciplinary assessment work undertaken, the demonstrated planning need is therefore considered to clearly outweigh the potential ecological harm, as required by policy.
16. **Suitability of Ecological Mitigation/Enhancement.** The written response provided by the CDC Ecology Officer noted that ‘like for like’ habitat provision (in terms of area and condition) is typically sought. However, the written response acknowledges that, in principle, the proposals for habitat enhancement/creation could, overall, lead to greater ecological value within the Site.
17. As detailed above, policy requires that where there are losses to higher value habitats (including LWS), appropriate mitigation must achieve a “*achieve a net gain in biodiversity*”. The ability of the proposals to achieve a BNG has been demonstrated through the submitted Biodiversity Metric and CDC have confirmed this Metric is robust and appropriate. As such, the proposals are clearly policy compliant in this regard.
18. Notwithstanding the above and that ‘like for like’ provision is not a policy requirement *per-se*, it is acknowledged that the delivery of comparable habitat types is clearly desirable in this location. Indeed, and as detailed in previous submissions including the Ecological Assessment, the proposed habitat types have been specifically sought to ensure a net gain in those habitats of greatest value within the Site (and wider Site).
19. In particular, the proposals seek to ensure a substantial net gain both in the extent of good quality calcareous grassland, as well as Open Mosaic Habitat (OMH). The proposals will deliver a net gain in both of these habitat types, with a net gain of approximately 1.29ha good quality calcareous grassland, and in excess of 26.27ha of OMH being delivered within the perimeter track area. As detailed previously, calcareous grassland would form a significant sub-component of the OMH being delivered within the Site. A net gain in these high quality habitats will demonstrably mitigate for overall losses to poor condition (species-poor) grassland within the perimeter track and will ensure appropriate and desirable

habitat types are retained on Site post-development. This is clearly compatible with the ethos of both planning policy and biodiversity metrics.

20. It is noted both of the above habitat types (OMH and good quality calcareous grassland) are recognised on the site citation for Bicester Airfield LWS and are clearly desirable habitats in this location.
21. In contrast, the grassland within the perimeter track, despite its calcareous tendencies, is not assessed as being of higher ecological value, being subject to intensive management (over an extensive period), which has prevented the establishment of a diverse sward. This reduced value is further recognised by the fact the central airfield is not designated as a LWS. Losses to this species-poor habitat are therefore considered to be of much reduced ecological significance.
22. A guiding principle of future management is that new areas of OMH, as well as enhanced calcareous grassland, will achieve a quality sufficient for designation as LWS (e.g. as an expansion to the Bicester Airfield LWS). As such, through achieving a net gain in good quality habitats, the proposals also offer a realistic mechanism by which the overall extent of the LWS may be increased in the short to medium term. The delivery of new and enhanced habitats (as would be underpinned by biodiversity led management – see below) would therefore offer an opportunity to avoid a long-term reduction in LWS habitat, and indeed ensure an expansion in LWS extent may be achieved.
23. As requested by CDC Ecology, a plan detailing where higher quality habitats (good quality calcareous grassland) are envisaged to be lost, and where higher quality habitats (good quality calcareous grassland and OMH) are to be created/enhanced, is provided at Appendix 1.
24. Whilst it has been identified previously, it is relevant to note opportunities for long-term biodiversity led management offer betterment over and above that 'recognised' in adopted Biodiversity Metrics. For example, the proposals are to come forward with 'in-perpetuity' management, safeguarding a biodiversity legacy for the Site significantly beyond the 30 year period that is to become mandatory through the Environment Act.
25. Moreover, Metric tools overlook the real world benefit of 'retaining' good quality habitats in 'good' condition. For grassland habitats in particular, on-going management is essential to maintain habitat condition in the long-term. Instigation of such management carries a cost and, resultantly, in the absence of facilitating development, such management is likely to cease in the short to medium term, to the longer-term detriment of the habitats present. There is a clear value to 'retaining' good quality habitats that goes unrecognised as part of Biodiversity Impact Assessment (Metric) process, and which is of particular relevance in this instance.
26. In summary, the habitat mitigation and enhancement proposals for the Site can demonstrably achieve BNGs and do so in a manner that allows for locally appropriate and desirable habitat types to be retained, enhanced or otherwise created within the Site.
27. The proposals can therefore be assessed as fully compliant with planning policy (and in particular Policy ESD 10).

Uncertainty on the success of proposed habitat enhancement/creation in the absence of further details on management.

28. The written response provided by CDC Ecology acknowledges that, in principle, the proposed habitat creation/enhancement may allow for net gains in biodiversity to be achieved. CDC Ecology further confirmed this to be their position during further discussions held between them and Ecology Solutions on 25 November 2021.
29. Notwithstanding this position, CDC Ecology maintain the position, as set out in their written response, that in the absence of further details on habitat management "*it is hard to tell if this [the predicted ecological uplift] is achievable*".
30. Ecology Solutions discussed this point further with CDC Ecology on 25 November 2021 to further understand the additional information (or otherwise planning safeguards) CDC Ecology would require to have confidence, at this stage, in the predicted biodiversity uplift being achieved.
31. Following discussions with CDC Ecology, and noting the Outline nature of the proposals, CDC Ecology confirmed it would be appropriate for detailed management prescriptions to be secured by way of a suitably worded planning condition attached to any successful permission. In this regard, it is proposed a dedicated, Landscape and Biodiversity Management Plan (or similar) be secured for the proposals. This Management Plan, which would need to be agreed in writing with CDC prior to construction commencing, would, amongst other matters, detail the precise habitat creation, enhancement and management proposals for new and existing habitats, including maps to identify the locations and extent of relevant habitat types.
32. Through the introduction of this condition, CDC can ensure appropriate management is secured for the Site, such that the requisite biodiversity uplift can be achieved and long-term enhancements delivered for the Site.
33. Notwithstanding an agreement that detailed management prescriptions may be appropriately secured by planning condition, CDC Ecology requested some overarching management principles be identified at this stage, in order to give further assurance of the proposed approach. Appropriate management principles are identified below.
34. **Calcareous Grassland.** Management of calcareous grassland, such that all identified examples of this habitat can attain or retain 'good' ecological condition, are envisaged to include:
 - Habitat Retention/Enhancement
 - Retained habitats to be identified, demarcated and safeguarded during construction, with appropriate barriers or fencing erected as required.
 - Species-poor grassland, which is to be enhanced, to be subject to an initial harrowing regime in the first available autumn period, after which a seed source from the wider Site (i.e. green hay/turf/collected seed) will be distributed.
 - Longer-term management
 - Commencement of an annual cutting regime in the late summer (August/September), with a proportion of the grassland (20%) left un-cut each year.

- Further cuts may be undertaken in late autumn (October) or otherwise during the spring period (i.e. March onwards), subject to growth rates.
- Management to target a structurally diverse grassland of varying sward heights, which includes a patchwork of transitional habitats including scattered scrub (~5%) within the sward.
- Creation of localised areas of bare ground through rotational soil disturbance (<10%).
- Removal of the majority of arisings (first allowing for seed to set).

35. **Open Mosaic Habitat (OMH).** OMH creation and management will seek to ensure a diverse range of early successional habitats may be delivered. This management will seek to ensure all the necessary criterion for this habitat type (as per Table 1 overleaf) are represented across the Site.

	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. At this stage habitat creation and management principles are envisaged to include for:

- Habitat Retention/Creation.
 - Retention of significant areas of calcareous grassland at any one time, with this to be subject to a reduced mowing regime which will permit botanical diversification over time.
 - Where appropriate, areas of OMH to be created via selective re-use (translocation) of materials from elsewhere on Site (for example where calcareous grassland is lost). This to allow 'like-for-like' habitat creation and the retention of local genetic stock.
 - Imported materials to be agreed with Ecological Clerk of Works (ECoW) such that a diversity of soil/ground surface materials/vegetation types can be delivered.
 - Areas of bare ground to primarily be allowed to colonise naturally or otherwise be seeded with materials from the wider Site, such as green hay or collected seed. 10% of soils proposed to be subject to supplementary seeding, with a bespoke, pollen rich seed mix to be agreed.

- OMH creation to include for localised topographical ‘sculpting’, allowing creation of topographically varied ground conditions such as depressions or low-height bunds.
- Longer-term Management
 - Instigation of an appropriate management regime which seeks to create a diverse vegetation structure, maintain open ground and prevent the onset of ecological succession. At this stage areas of recolonising mosaic/OMH are envisaged to be cultivated each autumn (September/October), with one quarter of the habitat area harrowed or scarified each year;
 - Habitat areas which avoid scarification or harrowing are anticipated to be subject to a minimum two cuts per annum, with arisings removed following a period to allow seed dispersal. Localised areas (10% of area) to remain uncut each year.
 - Where necessary, to bolster the seed bank, long-term management will give consideration to the re-application of a desired seed source (either as a green hay translocation from the wider seed source, or application of a bespoke, commercially available seed mix).
 - Management to be mindful of retaining topographical diversity, with periodic ‘re-sculpting’ of the ground surface should this be necessary. It is unlikely such re-sculpting would be required more than once in any five year period.
 - Management to allow targeted removal of undesirable species will be undertaken as required.

37. **OMH (Ecology Car Parks).** Ecology car parks are envisaged to be only a minor component of the overall OMH provision and, indeed, are not included as part of the OMH measurements within the submitted Metric. They nonetheless remain an aspirational component of the scheme to be incorporated at a detailed design stage.

38. These areas will likely be subject to more regular use but will nonetheless offer additional variety to the early successional habitats proposed within the Site. The following habitat creation and management principles are envisaged:

- Ecology car park areas will comprise unmetalled surfaces, thereby allowing for floral establishment.
- In areas likely to be subject to higher levels of vehicular use, the habitat surface will comprise ‘reinforced grass’, with a mesh membrane (TERRAM or similar) installed over a pre-seeded surface.
- Where areas of car parking are envisaged as being subject to less regular use, TERRAM will not be installed, with these areas comprising a mixture of compacted gravels and/or nutrient poor sub-soil/clay.
- The seed mix for these higher use areas will comprise low-lying, calcareous favouring species which are more resilient to disturbance. A representative seed mix is provided below:
 - 15% Sheep’s Fescue *Festuca ovina*;
 - 10% Red Fescue *Festuca rubra*;
 - 5% Smaller Cat’s-tail *Phleum bertolonii*,
 - 5% Blue Fleabane *Erigeron acris*;
 - 15% Birds-foot Trefoil *Lotus corniculatus*;
 - 5% Lesser Trefoil *Trifolium dubium*;

- 5% Narrow-leaved Bird's-foot Trefoil *Lotus tenuis*;
- 5% Hop Trefoil *Trifolium campestre*;
- 5% Black Medick *Medicago lupulina*;
- 5% Mouse-ear Hawkweed *Hieracium pilosella*;
- 3% Common Restharrow *Ononis repens*;
- 4% Basil Thyme *Clinopodium acinos*;
- 3% Thyme-leaved Sandwort *Arenaria serpyllifolia*;
- 5% Common Centaury *Centaureum erythraea*; and
- 10% Biting Stonecrop *Sedum acre*.

Summary and Conclusion

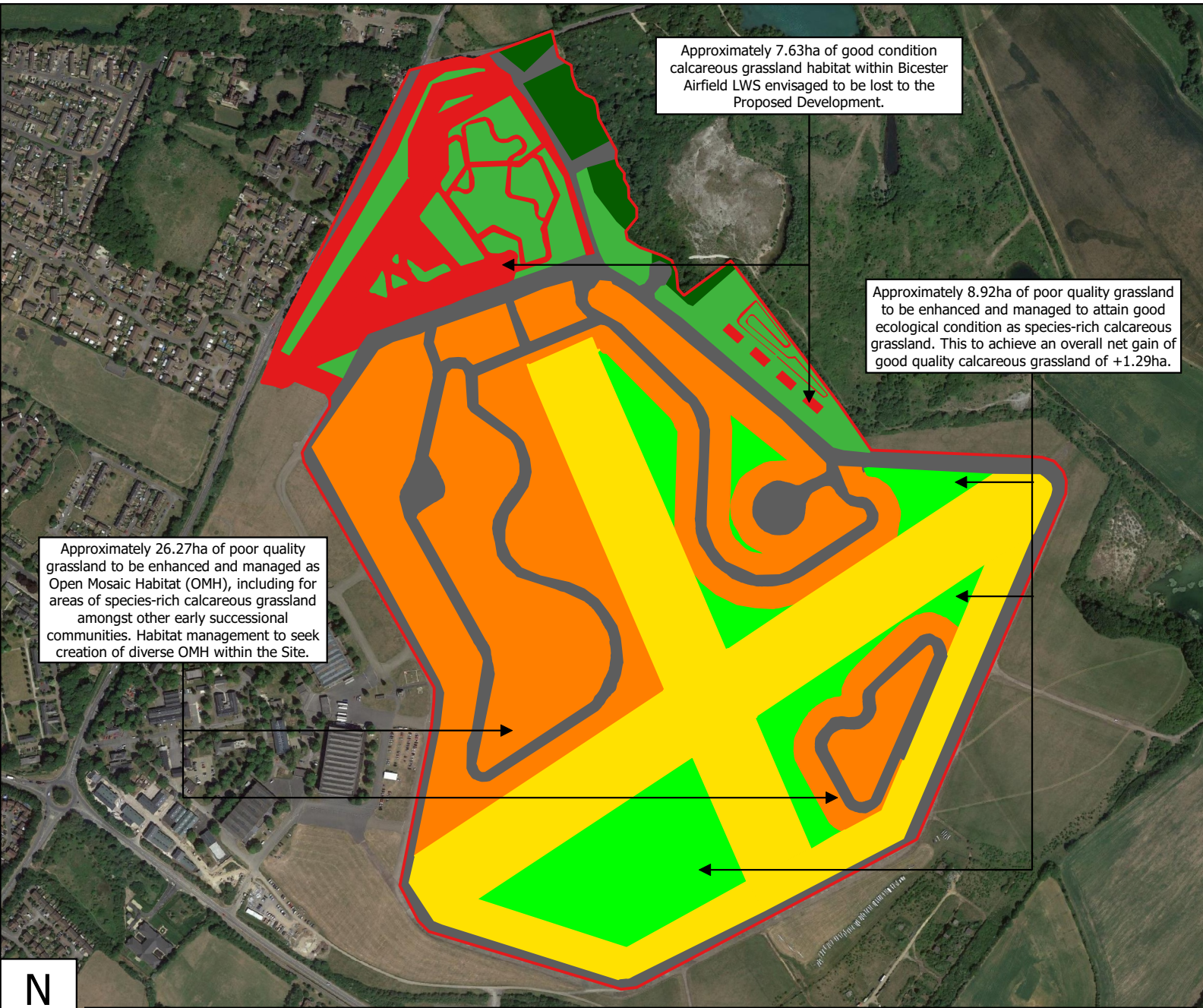
39. This Response Note serves to respond to matters raised by CDC Ecology in their written response dated 19 November 2021, as well as matters considered in a follow up discussion on 25 November 2021.
40. **Biodiversity Metric.** CDC Ecology have confirmed the Biodiversity Metric prepared and submitted in support of the proposals is robust and appropriate to inform the planning application.
41. **Justification as to habitat/LWS losses.** Further justification has been provided to demonstrate both the planning need (benefits) associated with the proposed development, as well as the appropriateness of proposed mitigation and enhancement measures. The need for appropriate development at the Site is identified at a strategic level through Policy Bicester 8, whilst the scale, quantum and siting of proposed built form has been tested through an extensive master planning stage, with this adopting a multi-disciplinary approach further informed by two Pre-App' meetings with CDC Officers. The need for, and benefits of, the development have been clearly identified through the above process and are considered to outweigh the potential harm to biodiversity receptors.
42. The potential for biodiversity harm to arise has been recognised, quantified and assessed, including in liaison with CDC Ecology (again through Pre-App' advice and subsequent meetings). The Ecological Assessment submitted for the proposals has carefully considered opportunities for mitigation such that a net gain in desirable, high quality habitats may be achieved and ecological betterment (BNG) achieved. The opportunities for net gains in biodiversity are further supported by the agreed Biodiversity Metric for the Site. It is therefore clear the proposals may fully comply with policy and legislation of relevance to biodiversity and nature conservation.
43. **Long-term Habitat Management.** It is the agreed view of Ecology Solutions and CDC Ecology that detailed habitat creation and management prescriptions may be appropriately secured by a suitably worded planning condition, as is proposed to be attached to any successful planning application.
44. A suitably worded condition would provide a sufficient safeguard to ensure appropriate management is secured for the Site, and the requisite biodiversity uplift achieved such that long-term biodiversity enhancements are realised.
45. In order to give further reassurance of approach, overarching management principles are identified within this Response Note.
46. **Summary.** In summary, the additional information provided within this response Note serves to address the outstanding matters raised by CDC Ecology. As

detailed above, the proposals have been informed through extensive pre-app' discussions with CDC, including with regards biodiversity matters. Where ecological harm is predicted, appropriate mitigation and enhancement opportunities are identified, whilst the planning 'need' for potential harm has also been demonstrated.

47. The proposals can therefore come forward in full compliance with policy and legislation pertaining to biodiversity and nature conservation.

APPENDIX

APPENDIX 1
Plan ECO1 – Calcarous Grassland:
Loss and Gains



Approximately 7.63ha of good condition calcareous grassland habitat within Bicester Airfield LWS envisaged to be lost to the Proposed Development.

Approximately 8.92ha of poor quality grassland to be enhanced and managed to attain good ecological condition as species-rich calcareous grassland. This to achieve an overall net gain of good quality calcareous grassland of +1.29ha.

Approximately 26.27ha of poor quality grassland to be enhanced and managed as Open Mosaic Habitat (OMH), including for areas of species-rich calcareous grassland amongst other early successional communities. Habitat management to seek creation of diverse OMH within the Site.

Creation / enhancement of significant areas of OMH and species-rich calcareous grassland will achieve a substantial net gain in high quality habitats within the site. A guiding principle of future management is that new areas of OMH, as well as enhanced calcareous grassland, will achieve a quality sufficient for designation as LWS (e.g. as an expansion to the Bicester Airfield LWS). As such, through achieving a net gain in good quality habitats, the proposals also offer a realistic mechanism by which the overall extent of the LWS may be increased in the short to medium term. This will be secured by biodiversity led management in perpetuity.

Key:

- Site Boundary
- Good quality grassland lost to proposed development
- Grassland to be enhanced as good condition calcareous grassland
- Good condition calcareous grassland to be retained and managed in perpetuity
- Existing grassland retained in current condition / management
- Poor quality grassland to be enhanced and managed as OMH
- Retained / Proposed Sealed Surface
- Retained and enhanced Woodland



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PLAN ECO1: LOSS, GAINS AND ENHANCEMENTS TO 'GOOD' QUALITY CALCAREOUS GRASSLAND AND OMH	Rev: A Dec 21
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