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Neil Cottrell, Senior Planning Manager
CALA Homes (Chiltern) Ltd
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4th May 2021

RE: Fewcott Road, Fritwell Biodiversity Net Gain review

Dear Neil,

I have reviewed the biodiversity net gain information for Fewcott Road, Fritwell. This is to address condition 17 of the outline planning consent as stated below:

'17. Prior to the commencement of the development hereby approved including any demolition, and any works of site clearance, and as part of any reserved matters for layout and landscaping, a method statement and scheme for enhancing biodiversity on site such that an overall net gain for biodiversity is achieved, to include details of enhancement features and habitats both within green spaces and integrated within the built environment, shall be submitted to and approved in writing by the Local Planning Authority. This shall also include a timetable for provision. Thereafter, the biodiversity enhancement measures shall be carried out and retained in accordance with the approved details. NOTE: It is advised that this condition include a Biodiversity Impact Assessment to show how a clear net gain for biodiversity will be achieved. Landscape and Ecological Management Plan (LEMP)'

This note serves to demonstrate how a net gain for biodiversity can be achieved for the scheme. It is not a Landscape and Ecological Management Plan. This letter should be read in conjunction with the DEFRA biodiversity net gain metric for the site, the Lockhart Garratt Extended Phase 1 Habitat Survey Report (Ref: 18-1615) and the Lockhart Garratt Phase 1 map with habitat areas (Ref: 20-4746).

All of the work reviewed here has been carried out by Lockhart Garratt (LG). I have not visited the site or carried out a survey and this review has used data collected by Lockhart Garratt and other information provided to me by CALA Homes.

Summary

In summary the Lockhart Garratt assessment was found to be robust. Ethos made some minor modifications to the calculations to better reflect the scheme proposals, which resulted in a minor reduction in the net loss of biodiversity. Further details are below.

Existing baseline habitats

The baseline habitats (Figure 1) were mapped using the previous assessment undertaken by Lockhart Garratt (Feb 2021) and amended to match the most recent proposed boundary. LG mapped the habitats on site using the Phase 1 habitat classification system. The DEFRA biodiversity net gain metric uses the UKHab habitat classification system and as such a translation of the habitat classes is required to use the metric. This translation is not one-to-one and therefore there is room for misinterpretation of the habitat classes in UKHab when translating from Phase 1. Ethos updated the habitat types on site to UKHab, including more realistic translations for the habitat types, based on our experience of using UKHab in the field and in the metric. This made very little difference to the overall calculation of the baseline, but does better represent the habitats and land use on the site.

The baseline habitats are:

- Modified grassland;
- Other neutral grassland;
- Ruderal/Ephemeral;
- Developed land; sealed surface; and
- Vacant/derelict land/bare ground.

Figure 1: Existing baseline habitats

The condition information was taken from Lockhart Garratt's reports and the connectivity scores from the DEFRA metric user guide. The site is not within any area identified as a strategic priority for biodiversity, nor is the location of the site ecological desirable.

The baseline habitats generate 7.58 biodiversity units. There is also 0.46 km of native species hedgerow on site which generates 3.68 biodiversity units.

Proposed habitats

The proposed habitats were mapped and calculated using site layout plan PLN.02 Rev. N (Figure 2).

Areas of open space were calculated as enhanced from the existing modified and neutral grassland rather than lost and created as in the previous assessment. The paddock south of the site was similarly retained.

Street trees have been included in the Ethos assessment; these have been sized according to the guidance in the technical supplement for the DEFRA metric 2.0.

The retained hedgerows have been enhanced as opposed to retained as in the previous assessment. New hedgerows have also been created.

Figure 2: Proposed habitats

The proposed habitats generate 5.07 biodiversity units, resulting in a net loss of 2.51 units (-33.18%). Hedgerow enhancement and new hedgerow planting generate 4.02 biodiversity units, resulting in a net gain of 0.34 units (9.21%).

The landscape proposals maximise the biodiversity enhancements that are achievable on site. Any additional enhancements would not be realistic, achievable or sustainable.

A copy of the DEFRA biodiversity net gain metric is enclosed with this letter.

Addressing residual impacts

To address the remaining net loss and to deliver a net gain for biodiversity on this site, I propose that a biodiversity offset is used to enhance habitats off-site. It is proposed that the Trust for Oxfordshire's Environment (TOE) will create a biodiversity offset of sufficient size to offset the residual impacts of this scheme. The offset will need to generate approximately 3 biodiversity units to offset the impacts from the scheme. Further details of the offset will be provided by TOE once it has been identified.

Conclusion

Yours sincerely,

Dr Dan Carpenter, CEnv
Associate Director, Ethos Environmental Planning Ltd