David Lowin

From:	Charlotte Watkins
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To:	David Lowin
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21/03644/OUT

David

With regard to the above application, the site is mainly arable with some hedgerows and to the edge some habitats of ecological value. The illustrative masterplan currently suggests that much of this habitat of greater value will be retained albeit it will then also be used for amenity, dog walking etc.. as well as for wildlife which will unavoidably degrade its value to some extent.

The applicants have carried out a biodiversity impact assessment (BIA) using a metric which demonstrates a 10% net gain for biodiversity is achievable on site within the current illustrative layout. It would have been preferable if they had submitted the metric itself so we could assess it and see what they hope to achieve in terms of condition for habitats. I couldn't find a copy of it but I may have missed this?

At least some of the gain for biodiversity relies on enhancing the easement as meadow grassland. I am not sure how easy this would be in terms of long term management and a long thin strip of habitat like this would likely not be as beneficial for wildlife as a more contiguous area. I appreciate this has been suggested so that it fits in with the application red line but I think this should be rethought in terms of what makes the most sense for both wildlife and for habitat management. I also could not tell if this area and the SUD/pond towards the main road would also be used for amenity purposes? If the area around the SUD could be enhanced for wildlife and left as a refuge without, or with limited, public access I would be supportive of this.

There is reassurance given within the documents that should final plans not achieve 10% net gain on site then there is additional adjacent land within the developers ownership which can be used for this purpose. There looks to be sufficient scope within the land outlined for this for this to be possible (ideally it would anyway be included for a higher quality scheme overall ecologically..). It must be ensured therefore that within any agreements the option is open for this off-site land to be used if needed and that it is not also forming part of an alternative scheme. An updated BIA metric will anyway be required when layouts are finalised and within a pre-commencement Landscape and Ecology Management Plan.

With regard to protected species there are few direct issues on site. There is a good variety of bats using the site for commuting and foraging, including some rarer species such as Barbastelles, and any development on site will need to have regard to maintaining this value to bats. A sympathetic lighting scheme will therefore be very important as will retaining meaningful buffers to surrounding vegetation such that dark corridors can be maintained. There are multiple records of badgers within close proximity of the site and given their mobile nature a pre-works update survey would need to be made before any works commenced and best practice with regard to mammals during construction must be contained within a CEMP for biodiversity. Protection for other species, such as nesting birds, and for retained habitats will also need including within a CEMP.

In addition to achieving a measurable net gain for biodiversity within habitats we look for enhancements within the built environment. CDC recommends and seeks the equivalent of at least one bat or bird (e.g. swift bricks) provision per dwelling to be integrated into the fabric of the building to ensure its retention for the lifetime of the development. Other enhancements should include hedgehog highways, log piles, invertebrate houses etc.. these suggestions are also made within the ecological survey report.

Please do get back to me with any queries.

Kind regards Charlotte

Dr Charlotte Watkins Ecology Officer Tel: 01295 227912 Email: <u>Charlotte.Watkins@Cherwell-DC.gov.uk</u> www.cherwell.gov.uk

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