

**From:** Charlotte Watkins  
**Sent:** 12 April 2022 00:10  
**To:** Sarah Greenall; Planning  
**Subject:** 21/03759/F - Land East of The Leys, Adderbury

With regard to the above application, I have read through the relevant documents and have the following comments:

The bat survey submitted (2017) appears to refer to a barn which does not form part of this application but does involve mitigation which is sited within this application boundary. It references a bat loft above a bin store in the North West of this site however I could not find any plans showing the location of this within this application and this should be made clear so it is not missed.

Great crested newts – whilst the survey report outlines Reasonable Avoidance Measures to avoid harm to GCN during construction it does not appear to outline any mitigation for the loss of habitat to GCN. The RAMs outlined in Section 5 of the Great Crested Newt Assessment dated 2017 can be conditioned but mitigation for habitat lost should also be made clear. The assessment mentions hibernacula but only as an optional feature – if such features are to be included this should be made clear and the location shown so it is certain it can be accommodated on site. The assessment is now five years old and as such the population numbers in ponds in the vicinity may have increased making an offence more likely. The applicant would have been best to apply for the works to be covered by our District licence however this needs to be applied for prior to determination.

All points within section 5.4 of the updated ecological impact assessment 2020 can be conditioned and should be adhered to.

Hedgehogs are likely to use the site. Preferably therefore close board fencing should not be used as this prevents hedgehogs (and badgers) from moving across the site. Where it is necessary to include close board fencing this should contain hedgehog highways at regular intervals (holes of at least 13cmx13cm cut into the bottom or in pre-made gravel boards).

There is no demonstration within the documents that there will be a net gain for biodiversity as a result of this development. Habitat will be lost on site and is not clear that it is being replaced and enhanced. The ecological assessment suggests new hedgerows will be included but these are not indicated on the layout plan. We seek a net gain in habitats of at least 10% as calculated by a Biodiversity Impact Assessment calculation metric. Where a metric is not used (on smaller sites, which this could be said to be) the overall gain for biodiversity should be demonstrated clearly through landscaping and layout or with enhanced habitat management on adjacent areas. This is in addition to integrated bat/bird bricks within the dwellings. Currently it appears there could be a net loss for biodiversity on site and this would be contrary to policy and National guidance.

Please get back to me with any queries

Kind regards

Charlotte

**Dr Charlotte Watkins**  
**Ecology Officer**