

**From:** Charlotte Watkins  
**Sent:** 29 March 2022 13:43  
**To:** Caroline Ford  
**Subject:** RE: 21/04275/OUT - Land at North West Bicester

Caroline

The surveys carried out to date are generally satisfactory in scope and depth. The following will need to be conditioned for any and all phases:

A CEMP for biodiversity to include information on protection of retained vegetation, nesting birds and bats in trees.

A great crested newt licence and mitigation scheme.

A detailed specific lapwing (*Vanellus vanellus*) mitigation strategy.

A detailed lighting strategy.

Biodiversity Strategy to include detailed Habitat Management Plan/LEMP/monitoring and details of all provisions for biodiversity within the built environment (green roofs, insect, bat and bird bricks).

However I have a couple of issues with the submitted information – firstly I cannot find a submitted DEFRA metric demonstrating how a minimum of a 10% net gain (or any net gain) will be achieved on site. It is mentioned that this has been carried out (table 9.2 of Chapter 9 of the ES) and is required under the SPD but I could not find it amongst the documents or any reference to the achievement of net gain by this measure. Whilst it may be intended to include this with the final Biodiversity Strategy the outline stage is often the only time when a scheme is considered holistically therefore as a minimum there should be an illustration of how they can broadly achieve a net gain at the levels we expect even if it is only with the illustrative masterplan and to be updated at reserved matters.

Under the NW Bicester SPD (9e) it states 'As it is not possible to mitigate for the Impact of farmland birds on the site, off site mitigation measures should be provided and all applications within the masterplan area should contribute to the provision of off-site mitigation'. The Environmental statement acknowledges that there is no way to compensate for loss to farmland birds through design however it does not mention it's contribution to the overall off site scheme for farmland birds. This should be made clear as the agreed choice for compensating for the loss to these species.

Kind regards

Charlotte

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