

## Wayne Campbell

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**From:** Charlotte Watkins  
**Sent:** 23 January 2023 11:46  
**To:** Wayne Campbell  
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Land at Bicester Road Kidlington

With regard to the above application, the ecological appraisal is generally sufficient in scope and depth. I would concur with some of the points made by BBOWT however which should be addressed at least at reserved matter stage.

Farmland birds – Policy PR7a does state in section 11 (h) (and 108 in appendix 4) that a BIMP shall include farmland bird compensation (not mitigation as it is acknowledged that most of this group cannot be adequately mitigated within a development context). Whilst farmland bird surveys have not been carried out, the ecological appraisal does mention the presence of flocks of starlings which are themselves a red list species and it can be assumed that further farmland bird species may use the site and that the loss of the site would represent a loss of opportunity for farmland birds. This is not addressed within the updated BIMP.

Most other protected species issues can be dealt with through a CEMP for the construction phase, with updated surveys for badgers and nesting birds where required, further species specific update surveys for bats in trees will also need to be carried out.

A lighting strategy will be required.

An updated BIMP and Biodiversity impact assessment will be required at reserved matters stage with details on how public access will be managed, particularly within the semi natural habitat creation areas to ensure that the condition targets can be met. Currently the net gain proposed in habitats is very small (less than 2%). There appears to have been an updated BIA submitted since the first version however I cannot open this. Whilst Policy PR7a only specifies that net gains for biodiversity are required to be shown, the draft development brief (below) for the site makes it very clear the intention of CDC to seek gains of a minimum of 10%. I would expect something far closer to this level to be sought therefore to ensure that a net gain is likely to be achieved long term (and to avoid a net loss).

'Policy PR7a requires a Biodiversity Impact Assessment (BIA) be submitted as part of the planning application for the site and a supporting Biodiversity Improvement and Management Plan (BIMP) to inform detailed measures for securing biodiversity gains. The Government's forthcoming Environment Bill is likely to introduce a mandatory approach to require 10% biodiversity net gain. In recognition of that, in October 2019, the Council's Executive endorsed seeking a minimum of 10% biodiversity net gain through engagement with the planning process.'

A requirement for provision of green roofs and walls where viable is also within policy PR7a. I consider that more information should be given on why is not proposed for inclusion here. Green roofs can be included on even small buildings such as garages or bus shelters and I consider that further justification as to why this was not possible anywhere on site should be outlined.

In addition, CDC usually seeks where possible the equivalent of at least one integrated bat or bird provision per dwelling (albeit these may be best clustered) as this is considered best practice. The proposals here fall a bit short of that and it is not clear how many of the proposed boxes will be integrated. Integration is preferred as it ensures retention for the lifetime of the development. This information could be contained within an updated BIMP at reserved matters.

Kind regards  
Charlotte

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