## **Chris Wentworth**

From:	Charlotte Watkins
Sent:	27 January 2023 09:23
То:	Chris Wentworth
Subject:	22/01488/OUT

## 22/01488/OUT

With regard to the above application, in general an appropriate Ecological assessment has been carried out at the site. There are however a number of ecological issues.

Great crested newts have not been considered to the satisfaction of the newt officer as noted in her comments. Further information on great crested newts as per her comments should be submitted. Conditioning this is not best practice but possible wording could be discussed. If a district level licence route is chosen, acceptance on to the scheme needs to be shown via a certificate prior to determination.

A licence is required for bats and, should permission be granted, would need to be conditioned due to the presence of roosts in some of the buildings impacted.

A full lighting strategy is required which should be designed with the need to protect nocturnal wildlife in mind using guidance from the Bat Conservation Trust and ILP.

A CEMP for biodiversity would be required to be conditioned to demonstrate how retained vegetation and protected and priority species would be protected during construction. This should include a clear plan of Ecological protection zones, details of ECoW supervision and the need for updated surveys where relevant.

Updated ecological surveys will be required should more than two years elapse since the submitted PEA and commencement of any works.

A badger survey will be required prior to commencement of works and full details of any and all mitigation required submitted for approval.

The site has a very large footprint with a number of farmland birds, including red list species holding territory and therefore potentially impacted by the development. I do not entirely agree with the Ecological appraisal that conditions will be better for these birds following construction. I would refer you to BBOWTs full outline of the issue within their comments. There appears to be additional land in the applicants ownership to the South which could be used for a specific farmland bird mitigation site and this should be considered.

The applicants have submitted a BIA metric. This has been updated with a less ambitious habitat enhancement (now proposing other neutral grassland rather than lowland meadow) which is more realistically achieved (but means the net gain demonstrate is significantly less). I don't think the illustrative landscape masterplan has been updated to reflect this?

I concur with BBOWT that it would be prudent for the site to be considered on a field by field basis in terms of the metric and determining condition. Currently the whole 61ha of grassland is all put together and it seems unlikely that the condition would not vary at all within this large area and this would lead to an underestimate of current value which would likely result in a net loss to wildlife under current plans. Our records suggest that one of the fields in particular may be of greater value being highlighted as potentially Priority grassland.

A full LEMP demonstrating how the net gain proposed will be achieved, monitored and secured ongoing would be required. This should commit to achieving a net gain in biodiversity of at least 10% in both linear and area based habitats. It should include an updated BIA which considers the land area on a field by field basis, showing how each habitat will be created, enhanced and maintained. It is not clear to me whether the grassland to the South and East is intended for amenity use. If so there should be large areas reserved where public access is discouraged otherwise the biodiversity value will be much reduced.

In addition there should be provision on site for biodiversity enhancements such as log piles, hibernacula, bat and bird boxes and importantly features integrated into the buildings themselves to ensure their retention for the lifetime of the development. The feasibility of green rooves and walls on site should be considered and included wherever possible.

Kind regards

Charlotte

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

My usual working hours are: Monday-Thursday mornings.