

Cherwell District Council  
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**By email only**

**FAO Laura Bell**

8<sup>th</sup> September 2023

**23/02276/SCOP**

**Location: Stratfield Brake Motorcycle Track Oxford  
Road Kidlington**

**Proposal: Scoping opinion - new stadium development**

Berkshire, Buckinghamshire &  
Oxfordshire Wildlife Trust  
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Dear Laura,

In relation to the above scoping opinion request we have the following comments on behalf of the Berks, Bucks and Oxon Wildlife Trust. In the event that this comes forward as an application we would be grateful if you could let us know. As a wildlife conservation focused organisation, our comments refer specifically to impacts on species and their habitats which may occur as a result of the proposed development.

### **Cumulative Impacts**

The EIA should evaluate potential negative impacts on features of nature conservation importance that may arise as a result of other plans and projects either existing, in development or proposed. Appropriate measures to avoid, mitigation or compensate for these negative impacts should be specified within the EIA. In particular there is already a considerable quantity of development in the form of current applications that lie in almost all directions from the proposed application site. There is no need for us to specify each of these, they are well known and all can be found in the form of the Cherwell Local Plan Partial Review, several Development Brief consultations, and several current applications, as well as being indicated on page 6 of the “*New stadium development project vision May 2023*”. The stadium proposal is on top of numerous applications and each and every one contributes to closing the green gaps that exist between Kidlington and Oxford, and between Yarnton and Kidlington.

### **Avoidance of impact on designated nature conservation sites**

Policy ESD 10: Protection and Enhancement of Biodiversity and the Natural Environment of the Cherwell Local Plan states:

*“Development which would result in damage to or loss of a site of biodiversity or geological value of regional or local importance including habitats of species of principal importance for biodiversity will not be permitted unless the benefits of the development clearly outweigh the harm it would cause to the site, and the loss can be mitigated to achieve a net gain in biodiversity/geodiversity”*

The proposed development has the potential for adverse effects on a number of designated sites as set out below:

Part of the Stratfield Brake District Wildlife Site (DWS) is located within the red line boundary, and other parts of the DWS lie in close proximity. It includes an area of high wildlife-value woodland that lies directly within the red line boundary.

The site also lies about 630m from Meadows West of the Oxford Canal Local Wildlife Site (LWS), and is within 2000m of a vast number of Local Wildlife Sites (LWSs) to many to mention here.

Oxford Meadows Special Area of Conservation (SAC) and Pixey and Yarnton Meads SSSI are located approximately 1.9km south of the Site. Oxford Meadows includes vegetation communities that are perhaps unique in the world in reflecting the influence of long-term grazing and hay-cutting on lowland hay meadows. Pixey and Yarnton Meads SSSI are unimproved flood meadows on the bank of the river Thames. They have been grazed and cut for hay for more than a thousand years, with the result that they are botanically rich, with more than 150 species.

Given the ecological sensitivity of this area it is essential that the EIA should include results of appropriate surveys, and an assessment is made of impact on each designated site, including others in proximity as well that are not referred to above, including Duke's Lock Pond LWS, Wolvercote Mead LWS and Cassington to Yarnton Gravel Pits LWS, as well as numerous others within 2000m of the proposed development. The assessments must deal with potential impacts on both nationally and locally designated sites and how these will be avoided. The full range of possible impacts must be considered including air pollution (including through increased vehicle use), hydrology (noting that many of these habitats are extremely vulnerable in terms of hydrology), loss of ecological connectivity, and recreational impact (including factoring in the proposed hotel). Anything other than avoidance must be a last resort, but if impact cannot be avoided then detailed mitigation plans must be set out, as well as an explanation of how the benefits of the development in the location proposed outweigh its likely impact on the features of the designated sites.

### **Avoidance of impact on priority habitat and protected and priority species**

NPPF paragraph 179 states (our underlining):

*"To protect and enhance biodiversity and geodiversity, plans should:*

*a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*

*b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and*

identify and pursue opportunities for securing measurable net gains for biodiversity.

Policy ESD 10: Protection and Enhancement of Biodiversity and the Natural Environment of the Cherwell Local Plan states:

*“Development which would result in damage to or loss of a site of biodiversity or geological value of regional or local importance including habitats of species of principal importance for biodiversity will not be permitted unless the benefits of the development clearly outweigh the harm it would cause to the site, and the loss can be mitigated to achieve a net gain in biodiversity/geodiversity”*

The nearby designated sites contain numerous examples of priority habitat. The site itself also contains as far as we understand: good quality lowland mixed deciduous woodland priority habitat, other neutral grassland, willow coppice, hawthorn scrub and mixed scrub. The site includes wet areas within some of these habitats which increases the diversity. We understand the site to have good potential as a minimum for the following species groups: plants, birds, invertebrates and bats. There are also records nearby of a variety of amphibians and reptiles.

The EIA must fully demonstrate the measures which will be taken to minimise impacts on existing habitats and to incorporate those existing habitats into the proposed design. Negative impact on the lowland mixed deciduous woodland priority habitat must be avoided in full, but we would also draw attention to the ecological value of many of the other on-site habitats. If the application is pursued then it needs to minimise impact on other habitats as well and incorporate them into proposed wildlife-rich green space. It is essential that a substantial area of wildlife-rich habitat, semi-natural in type, and with no public access to some areas, is maintained and managed for wildlife in the northern part of the triangle as that is critical to maintaining a green corridor for wildlife between Kidlington and Oxford. As already stated above the potential impact on this green corridor is of the utmost concern. Wildlife must be made a priority of any green space within the site.

We are greatly concerned by the statement in the EIA Scoping Report as follows:

*“6.16. The majority of the habitats across the Site, such as the willow plantation, are considered to be of little intrinsic ecological value. The areas of semi-improved grassland and scrub is also considered to be of low ecological value in terms of its species content, comprising only common and widespread species.”*

An independent survey of the site that we are aware of suggests as far as we understand that at least parts of the willow coppice, scrub and other neutral grassland are of significant value to wildlife, particularly to invertebrates and plants. The wet nature of parts of the site contributes significantly to its diversity. The nature of the habitats of willow coppice and scrub also mean the site is likely to support a diverse and important bird assemblage.

The EIA should include results of appropriate surveys, an assessment of impact, and details of mitigation, compensation and enhancement measures. A full range of habitat and species surveys are needed. As well as the usual ones these must include both bird surveys (both breeding and wintering), invertebrate surveys, and specialist botanical surveys. These must

deal with impacts on priority species (including breeding birds - see below) both on site and for priority species nearby.

We are concerned by the following in the EIA Scoping Report:

a) “6.25. Three breeding bird surveys have been proposed and will be conducted between June and July 2023.”

In our experience the standard number of breeding bird surveys is 6. The following website (<https://birdsurveyguidelines.org/methods/survey-method/> ) states: “As standard it is recommended that six bird survey visits be undertaken as part of a survey for breeding birds.” We see no justification for reducing this number in this instance. As an absolute minimum 6 separate breeding bird surveys should be carried out.

b) There is no mention of wintering bird surveys. We consider that wintering bird surveys are required.

c) We could not find any mention of invertebrates at all in the Scoping Report. This is a significant omission of great concern. It is essential as we set out above that detailed invertebrate surveys are carried out.

#### Scoping in and out within the EIA:

We are very highly concerned by the section on scoping in and out within the EIA. IN particular there are numerous aspects not mentioned within scoping in that we consider should be scoped in, and are greatly concerned by some of the proposals for scoping out.

- a) Statutory sites – this was indicated as being scoped out. We cannot agree with this, and the EIA should make a detailed assessment of potential impact from air pollution (including associated impact), hydrology, ecological isolation through loss of connectivity, and recreational impact on the Oxford Meadows SAC (including taking into account of the proposed hotel), and on other SSSIs.
- b) Non-statutory sites – with the exception of the adjoining DWS these were indicated as being scoped out. We cannot agree with this, and the EIA should make a detailed assessment of potential impact from air pollution (including associated impact), hydrology, ecological isolation through loss of connectivity, and recreational impact on numerous Local Wildlife Sites and District Wildlife Sites
- c) As well as the need for detailed surveys as indicated above, then the following species should be scoped in: invertebrates, botany (species as well as habitats), and birds (all birds rather than just breeding birds).

#### Hedgerows

Hedgerows should be retained and enhanced. In exceptional circumstances if proposals involve removal of small sections of hedgerow for access purposes then a substantially longer section of hedgerow should be planted elsewhere on site to provide compensation. A management regime should be put in place for hedgerows across the site including a three-year rotation for trimming and allowing some stretches of hedgerow to remain untrimmed for longer.

There should also be at least a 15m buffer between any development and the hedgerows. These buffers should be maintained as dark corridors and should be of appropriate semi-natural priority habitat such as a mosaic of scrub and species-rich grassland.

### Breeding birds

DEFRA has provided guidance to competent authorities (including local authorities) on how to comply with the legal requirements of the Conservation of Habitats and Species Regulations 2017 (as amended). The guidance is available at: <https://www.gov.uk/guidance/providing-and-protecting-habitat-for-wild-birds>

The guidance states that:

*“As a competent authority, you must help to provide, protect and restore habitats for wild birds. This will help to make sure there are healthy populations of wild birds in their natural habitats across England and Wales...*

*...You must take appropriate steps to help:*

- *preserve, manage and re-establish habitat that is large and varied enough for wild birds to support and maintain their populations in the long term*
- *avoid any pollution or deterioration of wild bird habitat as far as possible*

*Your duty to provide and protect wild bird habitats applies when you carry out your functions, for example, when you: ...*

- *make plans or strategies to decide where activities or development should take place*
- *take decisions that might affect wild bird habitats, such as giving permissions or consents*

*...When you carry out your duties you should aim to provide or protect habitat that allows wild bird populations to maintain their numbers in the areas where they naturally live.*

*You should consider habitats used by wild bird species that are in decline and also habitats supporting wild birds with healthy populations.”*

The EIA should set out the steps that will be taken to “*preserve, manage and re-establish habitat that is large and varied enough for wild birds to support their population in the long term*” in relation both to “*wild birds that are in decline*” and to “*wild birds with healthy populations*”

With respect to any priority species impacted, the developer must show that the habitats provided on site will be sufficient to maintain or enhance the same populations of these species.

**The need to maintain a green corridor between Oxford and Kidlington**

The proposal raises serious concerns in terms of impact on the green corridor between Oxford and Kidlington. It is not alone on this, as the section on Cumulative Impact above sets out. However if it went ahead it would make a significant contribution to this loss, effectively removing the “last piece of the jigsaw” of undeveloped land between the two settlements. There are many non-wildlife concerns as to the removal of this corridor which are outside of the remit of this response. However the wildlife impacts of the loss of this corridor are very serious and must not be underestimated. There are numerous species of a variety of wildlife groups that rely on rural land for their survival. They are completely incompatible with urban development which is why they are rarely if ever seen in urban areas. These species also need to be able to move, in order to ensure genetic mixing between populations, and in order to move to more suitable habitat if the habitat they live in becomes lost. If their ability to move is lost then whole populations, as well as numerous individuals of species can be lost.

It is only necessary to look at a map of the area around Kidlington and Oxford, overlain with a map of sites already approved within the Cherwell Local Plan Partial Review Sites to see the extent to which the green corridor between Oxford and Kidlington is threatened, effectively isolating many wildlife populations to the west and east of Oxford and Kidlington from each other. Whilst the impact of the existing roads on wildlife movement is significant it is of a much lesser impact than a whole area of urban development.

Since it represents the loss of the last piece of undeveloped land (if the already allocated “Partial Review sites” go ahead) then if this proposal is acceptable at all it can only be acceptable if the developed land area is minimised and that any green space within the site is managed as a nature reserve with wildlife as the main priority. Whilst we note from the Project Vision document that the design includes the existing woodland, and some green space at the northern end, and a green roof, we do not consider this goes far enough in terms of maintaining a wide enough green corridor. The area of urban development must be reduced, the green space increased accordingly, and this green space must be managed with wildlife as the priority. It should be managed as a nature reserve, managed by or in association with a conservation organisation, and with a diverse range of semi-natural wildlife habitat. The value of the existing habitats to wildlife should be considered when designing the nature reserve. Public access should not be created across the main area of the reserve, although some public access along managed, screened walkways to viewing points could be compatible with wildlife being the priority for the area.

### **Proposals for wildlife management and maintenance**

Our view is that the Green Infrastructure, including habitats for wildlife within a nature reserve as set out above, should be managed in perpetuity (e.g. forever) and proposals should recognise this. To ensure management lasts for as long as the built environment is built up (e.g. likely to be forever) then an endowment fund will be needed to ensure that management costs can be covered. Conservation covenants should also be used to ensure that habitats created are retained forever. If an application were to be made, and were the local authority be minded to approve it, then it is essential that it would be seen as an end to development in the red-line boundary, as well as on any other greenfield sites in the immediate area, and not as a process that would unlock further development. The green, wildlife-rich, corridor between Oxford and Kidlington must be maintained and conservation covenants on the green space

habitats would be needed to ensure this. Also, there is a clear need for a funded officer-role to coordinate and oversee the management for wildlife of the green space on the proposed estate.

### **Conservation Target Area**

The Lower Cherwell Valley Conservation Target Area ('CTA') lies in close proximity to the proposed site. Further information on the CTA is available here: [https://uploads-ssl.webflow.com/62602eef03c83769e0539df4/63386d23e851f02af2da2e6b\\_Lower-Cherwell-Valley-CTA.pdf](https://uploads-ssl.webflow.com/62602eef03c83769e0539df4/63386d23e851f02af2da2e6b_Lower-Cherwell-Valley-CTA.pdf) . Oxfordshire Biodiversity Action Plan Targets associated with this CTA are lowland meadow – management, restoration and creation, floodplain grazing marsh – management, restoration and creation, lowland Fen (including swamp) – management and restoration, reedbed – management and creation, rivers – management and restoration (including management for water vole). We would therefore recommend that the CTA statement is factored in when considering the habitats to be created or managed on the site, although the value of the existing habitats must also be factored in as well.

### **Achieving a net gain in biodiversity**

Planning policy and the Environment Act will require the application to achieve a minimum 10% biodiversity net gain. However we must emphasise that other aspects of ecology in this particular case need to take precedence over BNG in terms of what habitat is provided, and that is the need for a wildlife-rich green corridor and nature reserve to ensure connectivity, as well as concerns over on-site and off-site impacts. As such if an on-site net gain of greater than 10% (and an on-site net gain is what should be sought in this case) is shown on the metric this does not necessarily in itself mean that enough has been done for wildlife.

We are concerned about the possibilities of the metric in this case undervaluing what is clearly a site of significant value for wildlife. We are concerned that the EIA Scoping Report referred to the willow coppice as an arable habitat. If the implication of this is an intention to value the habitat as arable, condition poor in the metric then we would be greatly concerned that this would greatly under-represent its value. It is not entirely clear where such a habitat should sit within the metric, but there is a clear need to use common-sense ecological discretion to give it a value that reflects what we understand in this case from independent surveys to be a significant habitat both botanically and for invertebrates, and one which by its very nature is also of value to birds. Consideration in the metric needs to be given to the value of the wet grassland, with a wide variety of species, that we understand underlies a significant part of the willow coppice, and the value of the willow coppice itself, its variation in age structure, and the value for many species of the glades produced when it is coppiced.

The metric User Guide does allow for such discretion e.g.

*“1.5.5. The outputs of this metric are not absolute values but provide a proxy for the relative biodiversity worth of a site pre- and post-intervention. The quality and reliability of outputs will depend on the quality of the inputs. The metric and its outputs should be used alongside ecological expertise as part of the evidence that informs plans and decisions.”*

*“Rule 5 - In exceptional ecological circumstances, deviation from this metric methodology may be permitted by the relevant consenting body or planning authority.”*

The biodiversity net gain should be calculated using the latest biodiversity accounting metric published by Natural England and all calculations should be provided, with the documentation available to consultees as part of any planning application. This must include a copy of the original Excel spreadsheet. It is also important that this Excel spreadsheet is uploaded to the planning website for any application so that consultees can assess the original metric spreadsheet. Full justification must also be provided for distinctiveness and condition scores for both pre-development and post-development scores. For condition scores this must include a table showing pass and fail for each aspect of the criteria for both existing and proposed habitats, and a justification for the pass or fail. A map of distinctiveness and condition scores for both pre and post-development habitat must also be provided.

A full management plan must also be included in the net gain report so that it can be seen that any intended ecological outcomes are achievable with the proposed management.

### **Lighting**

Given the ecological sensitivity of this area we consider that it is essential that the impact of lighting wildlife, and measures to minimise this impact should be included in the EIA.

The introduction of lighting into this rural-edge area could potentially impact upon a wide range of species, in particular on bats, birds and invertebrates. Presumably, some level of lighting is inevitable in the form of stadium floodlighting and lighting for visitors to evening fixtures. However that makes it all the more important that lighting is at the forefront of considerations in the planning application. The fact that lighting may sometimes be needed for evening fixtures or in dark weather conditions does not justify the use of unnecessary lighting at other times. On the contrary, when not essential all efforts must be made to eliminate all on-site lighting on other occasions. Any permanent night-time lighting in such a rural edge area would present a substantial-risk to wildlife, especially bearing in mind the need to maintain a dark corridor between Kidlington and Oxford to allow this to serve as a wildlife corridor.

So any lighting must be limited to the absolute minimum necessary, and must be designed in a way that minimises light spillage, using for example low-level bollard lighting for walkways, and even then only on occasions when there is a clear need. To put it simply then outside of the site there should be very little awareness in terms of lighting of the site being there at all, and an ecological lighting strategy should be written that ensures that the type and spectrum of lighting is used would be one that minimises negative wildlife impact. To minimise lighting impact on the adjacent District Wildlife Site and on on-site and off-site habitats and species then lighting should not be used on a permanent basis. The inclusion of a hotel and gym is thus of significant concern as it moves the development into a bracket of 365 days of the year night-time use as opposed to being occasional match days, and other occasional events, which could in themselves be limited by condition to a certain number of nights per year.

In conclusion, we believe it is essential that proposals include a lighting management plan to demonstrate how lighting will be avoided or otherwise minimised during both the construction and operational phases. It should cover at least the following points:



- a) Most importantly the need for lighting should be assessed, with a presumption against wherever possible. If lighting of walkways is needed for winter then low height and light level bollard lighting would be preferable. Bright security style type lighting would be of very serious concern in terms of impact on wildlife, particularly bats.
- b) Lighting must be directed away from the hedgerows and woodlands, and light spill into these areas should be avoided through use of cowls or equivalent.
- c) In addition, the choice of lighting type is critically important, as there are wide variations in wildlife impact depending on the spectra of lighting. The choice of lighting type will impact on whether invertebrates are attracted to lights, with negative impacts on them, and also on the impact upon bats, birds and other wildlife.
- d) Conditions/covenants that control the type/power/direction of security/outside lighting that can be installed are also needed.

For more details on this, see the recommendations of:

“A Review of the Impact of Artificial Lighting on Invertebrates, Charlotte Bruce-White and Matt Shardlow (2011)” [https://cdn.buglife.org.uk/2019/08/A-Review-of-the-Impact-of-Artificial-Light-on-Invertebrates-docx\\_0.pdf](https://cdn.buglife.org.uk/2019/08/A-Review-of-the-Impact-of-Artificial-Light-on-Invertebrates-docx_0.pdf) and

“Artificial Light in the Environment - Royal Commission on Environmental Pollution (2009)” [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228832/9780108508547.pdf.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228832/9780108508547.pdf.pdf)

and

Artificial Lighting and Wildlife, Bat Conservation Trust (2014) – downloadable from: [http://www.bats.org.uk/pages/bats\\_and\\_lighting.html](http://www.bats.org.uk/pages/bats_and_lighting.html)

### **Biodiversity in built development**

The scale of development proposed is such that any scheme should be exemplary in terms of integrating biodiversity features. The Wildlife Trusts have published 'Homes for people and Wildlife: How to build housing in a nature-friendly way' which sets out what a good, nature-rich housing development looks like. Whilst some of the publication clearly relates to residential development, the vast majority is also relevant to this development.

See: [https://www.wildlifetrusts.org/sites/default/files/2018-05/homes\\_for\\_people\\_and\\_wildlife\\_lr\\_-\\_spreads.pdf](https://www.wildlifetrusts.org/sites/default/files/2018-05/homes_for_people_and_wildlife_lr_-_spreads.pdf).

According to this, ‘All housing developments must result in:

- *A measurable improvement for wild species and habitats, which means*
  - *Avoiding any loss or damage of wildlife sites*
  - *Designing in existing habitats*
  - *Creating new habitat*
  - *More than compensating for any habitat that is lost*
- *All residents having lasting access to nearby nature”*

Research shows that green roofs can provide valuable habitats for wildlife (<https://livingroofs.org/biodiversity-and-wildlife/>).

Any application should maximise the provision of such rooves, and install solar panels on rooves which are not green rooves. The extent of biodiversity will depend on the type of green roof installed. Sedum roofs benefit a limited range of invertebrates and provide foraging for pollinators when in flower. Ecologically designed extensive green roofs can provide good habitat for wildlife, but there are limitations in terms of replicating habitat at ground level due to shallow depth of soils and the drying effect of wind and sun. According to [www.livingroofs.org](http://www.livingroofs.org), a good green roof designed for biodiversity should include a varied substrate depth planted with a wide range of wildflowers suitable for dry meadows.

Additional information on appropriate enhancements within the built environment can also be found in 'Biodiversity Positive: Eco-Towns Biodiversity Worksheet, produced by Town and Country Planning Association, Communities and Local Government, and Natural England', downloadable from: <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=2e0ffaf8-24b1-45fe-a02f-505a06d72ff2>

The table below (prepared by BBOWT) sets out features in developments to encourage biodiversity, and their associated benefits for people. Whilst some of the table below clearly relates to residential development, the vast majority is also relevant to this development:

	Biodiversity benefits	Reduces urban heat island effect	Reduces air pollution	Reduces water run-off
<b><u>Houses and Gardens:</u></b>				
Gardens: Fruit trees in each back garden; Wildflower turf making up part of lawn in each garden; Log piles; Hedgerows making up at least one boundary; Garden walls with overwintering shelter for insects	✓	✓	✓	✓
Green roofs on garages and public buildings	✓	✓	✓	✓
Green walls	✓	✓	✓	✓
Built in bird boxes including swift bricks, swallow and house martin and garden birds.	✓			
Built in bat boxes, bricks and lofts – suitable for crevice dwellers and roof void dwellers.	✓			
<b><u>Street network and small green spaces:</u></b>				
Street trees – tree lined streets; woodland copses.	✓	✓	✓	✓
Wildflower rich road verges and green corners etc. with loggeries, hibernacula, bug hotels	✓	✓		✓
Climbing plants on fences and walls	✓	✓	✓	✓
Any shrubs chosen to maximise: berries for winter bird food; flowers for pollen and nectar.	✓			
SUDS schemes including biodiversity	✓	✓	✓	✓
<b><u>Green Spaces</u></b> (In addition to large scale habitat creation and management above):				
Wildflower edging / shrubs around sports pitches, play equipment, kick-about areas.	✓	✓		✓
Hedgerows and buffers: management for wildlife	✓	✓	✓	✓

Long grass / bare ground / rockeries / hibernacula for reptiles	✓	✓	✓
Clean-water wetlands / ponds / ditches with surrounding wildlife grass habitat for amphibians – can be part of SUDS and independent of SUDS.	✓	✓	✓
Woodland	✓	✓	✓
Network of green and blue corridors without lighting	✓	✓	✓
Allotments	✓	✓	✓

**We request that the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) be consulted on subsequent applications on the site further to this scoping opinion request.**

Please contact us if you have any queries on this response.

Yours sincerely,

**Matthew Stanton,  
Head of Planning, Policy and Advocacy  
Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust**

Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust  
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