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Ms J Barker
Planning Housing and Economy
Cherwell District Council
Bodicote House
Bodicote
Banbury
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OX15 4AA

By email only

4th February 2011

Dear Ms Barker,

Re: Application by A2 Dominion Group/P3Eco (Bicester) Ltd. For development of exemplar phase of NW Bicester Eco Town (10/01780/HYBRID)

Thank you for consulting the Berks, Bucks & Oxon Wildlife Trust (BBOWT) on the above application. In addition to the normal legislative and policy guidelines in relation to biodiversity, we are looking for this eco-town development to meet the guidelines of the supplement to PPS1 on eco-towns with regard to biodiversity and green infrastructure, as well as following the eco-town worksheets on biodiversity and green infrastructure published by the TCPA, CLG and Natural England. In light of the guidance available, I wish to submit the following comments.

Summary

Overall, whilst the proposal is unlikely to be significantly detrimental to local biodiversity, it does not stand out as an exemplar in terms of biodiversity enhancements.

It is disappointing that the late provision of ecological survey information did not allow for ecology to be considered at initial stages of the design of this development. Further information is required in the Environmental Impact Assessment and I have provided details regarding this below. I consider that the level of information submitted is insufficient to determine whether the Eco-town will achieve the aim of a net gain in biodiversity, and as such whether it fulfils the requirements of the supplement to PPS1. Arrangements for the long term management of green spaces, including identification of a management body and funding, have yet to be secured. As a result it is unclear that the measures incorporated for biodiversity will be fully realised.

Environmental Impact Assessment

It is disappointing that results of ecological surveys reported in this assessment did not become available until November 2010, when development design was already well progressed.

In terms of the scope of the Environmental Impact Assessment, the results of wintering bird surveys are not available to inform the ecological assessment, so any gains or losses with regards to this group cannot be taken into account.

In relation to assessment of impacts on Ardley Quarry and Cutting SSSI, I note that it is reported that calcareous grasslands would not be enriched by nitrogen. Reference to the Air Pollution Information Service (APIS) website indicates that whilst this is often the case as phosphate is limiting, it is indicated that *B.pinnatum* (which currently occurs on the site) is tolerant of low phosphate and therefore an increase in this species may result from increased nitrogen, thus resulting in a change in species composition. I would therefore suggest that further consideration needs to be given to this issue, including assessment of contributions of nitrogen from increased traffic as well as the energy centre and with reference to the critical levels for nitrogen oxides, and critical loads for nitrogen deposition, for this habitat.

It should be noted that a systematic review of potential impacts on Local Wildlife Sites (LWSs) has not been included. Whilst many of the LWSs in the locality have been mentioned, I would expect to see an assessment of potential impacts on the specific features for which these sites have been selected as being of local value, this should include assessment of any likely recreational, air pollution or hydrological impacts.

Whilst impacts on Conservation Target Areas (CTAs) have been considered, the purpose of CTAs is in fact to identify areas of opportunity for biodiversity enhancements to help deliver the aims of the UK and local Biodiversity Action Plans (BAPs) through landscape scale conservation. Policy ET16.3 of the supplement to PPS1 indicates that the Biodiversity Strategy should set out priority actions in line with Local Biodiversity Action Plans. In line with this policy, I would wish to see an assessment of opportunities for the development to contribute towards the aims of the Tusmore and Shewell CTA and the Ray CTA. Whilst a negative impact on the Ray CTA has been excluded due to its location upstream of tributaries feeding from the proposed development site, I would wish to see consideration of the impact on the Otmoor CTA, and designated sites, which lie downstream of the proposed development.

I am surprised to find no mention of records for BAP priority butterflies in proximity to the proposed development, records were provided to Arup by Butterfly Conservation. These included brown letter hairstreak at Bure Park, and white letter hairstreak south of the application site. I would expect to see identification of opportunities to enhance the habitats for these species to encourage population expansion in line with Policy ET16.3 of the supplement to PPS1. Whilst I understand that hedgerow management is to be improved and may benefit brown hairstreak, the provision of elm for white-letter hairstreak does not seem to have been considered (varieties resistant to Dutch elm disease are available). The EIA also reports water voles in the nearby area, consideration should be given to design of water features to provide appropriate habitat for this species.

Delivery of a 'net gain in local biodiversity'

I welcome that a Biodiversity Strategy has been submitted with the application, as is required under Policy ET 16.3 of the supplement to PPS1. However, it is not clear that a net gain in biodiversity will be delivered. Policy ET 16.1 of the supplement to PPS1 makes it clear that 'Eco-towns should demonstrate a net gain in local biodiversity'. I have set out my concerns in relation to this below.

Overall, it appears that it is intended that delivery of a net gain in biodiversity would be achieved through retention of existing features including hedgerows and watercourses, including management of these features, and habitat creation within corridors of open space.

The eco-towns biodiversity worksheet emphasises the need to integrate biodiversity within the built environment to create a high degree of permeability for wildlife. Whilst bird and bat boxes are to be provided, I am disappointed not to see more innovative design of the built environment to provide for biodiversity.

Whilst more sympathetic management of the hedgerows may well benefit certain species, particularly invertebrates, the setting of the hedgerows will change, which in turn is likely to make them less attractive to some of the farmland bird species (for example yellowhammer) which currently use them. Therefore achievement of an overall net gain for this habitat and associated species is unclear.

The main corridor of open space following the watercourses in the southern section of the site is divided by roads. I understand that the bridges which are planned to carry these roads will consist of a box culvert. This is likely to reduce the ability of wildlife to move along these corridors of open space. It also creates a series of small management units which severely limits the ability to manage these areas in a suitable way to achieve successful wet grassland and species rich meadow creation. A clear span bridge design would be preferable to allow better connectivity and management of these areas.

Whilst the need to maintain dark corridors along the watercourses has been recognised in the submission, particularly with regard to provision of foraging corridors for bats, I have some concern that this will not be achieved particularly since there is likely to be demand to light pedestrian routes along these corridors. Consideration should be given to routing these paths along the edges of the corridors to maintain a larger proportion of unlit space and to aid management of these spaces.

I welcome that the development meets the PPS target for 40% Green Infrastructure, but the multi-functionality of this green space means that there are unlikely to be many areas undisturbed by the public, thus limiting the ability to achieve a net gain in biodiversity. Through planting design and use of wetland features (such as ponds, scrapes and fen habitats), it is possible to design areas of open space which allow for quiet areas for wildlife alongside those areas which are more accessible to the public, but currently the design appears to encourage access throughout most of the open space.

It has been identified that wet grassland and species rich grassland will be created within the watercourse corridors, but it is unclear whether the hydrology and soils in these areas suit these habitats. If the soils are too enriched or too dry or wet then creation of the habitats suggested will not be achievable. Additionally, in order to successfully create these grassland habitats, appropriate ongoing management will be needed. Such habitats need to be cut and/or grazed; since the species rich

grassland is also to be planted with trees it is unclear how this will allow for machinery to be used to cut the grassland. It does not appear that any fencing of these grassland areas has been identified, which would preclude the ability to graze. Grazing on such sites would provide the most effective management to achieve the desired habitats in terms of wildlife conservation and enhancement.

Since a management body, and mechanisms for funding management work, have not yet been secured it is not clear that the biodiversity benefits of management of existing features will be realised, or the successful creation of wildlife habitats will be achieved. We would encourage the applicants to consider creative approaches to long term management involving the local community. We had an encouraging meeting with the applicants to discuss the potential for BBOWT to be involved in this aspect and would be happy to pursue this further in order to help secure net gain in biodiversity for the residents and wildlife of the new eco-town.

I hope that these comments are useful; should you wish to discuss any of the matters raised, please do not hesitate to get in touch.

Kind regards,

Rebecca Micklem
Conservation Officer (Oxon)

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