

Berkshire
Buckinghamshire
Oxfordshire



The Lodge, 1 Armstrong Road
Littlemore
Oxford
OX4 4XT

FAO Matthew Parry

By email only

12th June 2015

Dear Mr Parry,

OBJECTION Re: 15/00837/OUT | OUTLINE - Residential development of up to 180 dwellings to include affordable housing, public open space, localised land remodelling, compensatory flood storage and structural planting. Part Land On The North East Side Of Gavray Drive Bicester

Thank you for consulting the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) on the above planning application. As a wildlife conservation charity, our comments relate specifically to the protection and enhancement of the local ecology on and around the application site.

I wish to submit an *objection* on the grounds that the application does not secure any management on the adjacent Local Wildlife Site (LWS) and is therefore contrary to emerging Local Plan policies.

Gavray Drive Meadows Local Wildlife Site (LWS) is directly to the east of the application site and falls within the ownership of the applicant. The LWS and part of the application site sit within the Ray Conservation Target Area (CTA).

Relevant policy in the emerging Local Plan

Policy ESD10: *'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'*

Policy ESD11: *'Where development is proposed within or adjacent to a Conservation Target Area biodiversity surveys and a report will be required to identify constraints and opportunities for biodiversity enhancement. Development which would prevent the aims of a Conservation Target Area being achieved will not be permitted. Where there is potential for development, the design and layout of the development, planning conditions or obligations will be used to secure biodiversity enhancement to help achieve the aims of the Conservation Target Area.'*

There is also a specific policy for the allocated site, Bicester 13, which amongst other things protects the Local Wildlife Site and CTA, and highlights the need to comply with ESD11. It also sets out a requirement for an Ecological Management Plan to be agreed with the Council in consultation with local biodiversity interest groups. This approach is supported in the Inspector's Report on the Local Plan, which highlights the need for the development to contribute towards enhancement of the Local Wildlife Site's ecological interest (para 139 Cherwell Local Plan Inspector's Report).

Impact from development on the Local Wildlife Site

It is recognised within the Ecology Chapter of the Environmental Statement (9.5.17) that the development will put the LWS at risk from adverse effects resulting from increased recreational pressure. To comply with Policy ESD10, mitigation is required to reduce the impact on the Local Wildlife Site and achieve a net gain in biodiversity. We do not consider the Public Open Space proposed along the Langford Brook sufficient to entirely mitigate the recreational pressure that will be generated by the development. Existing residents utilise Gavray Drive Meadows, and it is reasonable to expect that new residents of the proposed development would also. Long term nature conservation management of the Local Wildlife Site would help to mitigate the impact of recreational pressure on the site, improving the condition of the habitats and making them more resilient to recreational pressures.

Ecology of the Local Wildlife Site

The ecological surveys undertaken to support the Environmental Statement demonstrate the continued ecological importance of Gavray Drive Meadows Local Wildlife Site. The long awaited moth surveys have demonstrated that the site is of regional importance for this species group, and other surveys show the continued (and in some cases, increasing) value of the site for butterflies, great crested newts and reptiles.

The botanical surveys conclude the site still qualifies botanically as LWS, and identify the significant changes that have occurred on the site through natural succession during the past 9 or more years during which the site has unfortunately received no management. This highlights the importance of management to conserve the botanical interest of the LWS. The lack of management in recent years is regrettable, but it is encouraging that almost all of the meadow indicator species recorded in 2002 were found to still be present on the site. As is concluded in the botanical survey this indicates that, with management, the botanical interest of the LWS can be conserved and enhanced.

Conclusion

It is evident from the botanical survey report that management intervention is essential to prevent the loss of botanical diversity through ecological succession, and to improve condition of the grassland habitats. Management of the LWS is necessary to ensure its biodiversity interest is conserved, and by improving habitat condition could also help towards mitigating impacts from recreational pressure. It is also clear from the emerging Local Plan that the area of the LWS should be protected and enhanced and an ecological management plan produced and implemented. This is an approach endorsed in the Inspector's Report on the Local Plan.

An Ecological Management Plan for the long term management of the LWS should be produced by the applicant, and it's implementation secured by planning obligation. Without this commitment the application does not comply with emerging Local Plan policy.

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.

Yours sincerely,

Rebecca Micklem
Senior Conservation Officer (Oxfordshire)

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