**Ref: Gavray Drive Development and Oxfordshire’s CTAs**

**Planning Application Reference: 15/00837/OUT**

**FAO Matthew Parry**

11th May 2017

Dear Mr. Parry,

I am writing on behalf of Wild Oxfordshire in my role as Biodiversity Manager. Wild Oxfordshire is a local conservation charity with a vision for Oxfordshire’s environment to be healthy, sustainable and rich in nature for the benefit and enjoyment of all. A major part of my work is advocating the use of Conservation Target Areas (CTAs) for the restoration of nature across the county. Wild Oxfordshire (previously known as Oxfordshire Nature Conservation Forum) has been the custodian of the CTA process.

The CTA approach is supported by ‘[Biodiversity 2020: A strategy for England’s wildlife and ecosystem](http://www.defra.gov.uk/publications/2011/08/19/pb13583-biodiversity-strategy-2020/)services’, which sets out the Government’s ambition to halt overall loss of England’s biodiversity by 2020, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for wildlife and people.’ Local conservation projects are explicitly recognised as an important tool in delivering the national strategy.

The National Planning Policy Framework (NPPF) (section 11 paras 109-125) 'Conserving and enhancing the natural environment' includes reference to providing net gains for biodiversity where possible, protection and enhancement of networks of biodiversity and green infrastructure, promoting priority habitats and species and the importance of ecosystem services and soils.

The adopted Cherwell Local Plan 2011-2031 (Part 1) contains policies relating to biodiversity and the natural environment which both reflects the NPPF and, at the same time, the needs and priorities of their communities. I am particularly pleased to see Policy ESD 11: Conservation Target Areas, setting out Planning Policy in relation to these special areas for conservation.

We wish to provide additional support and guidance for the use of CTA’s in this particular planning application, and hope this will be of use to you in considering future planning applications in CTAs.

1. CTA’s are the spatial component of the Oxfordshire Biodiversity Strategy, as referenced in [Oxfordshire’s State of Nature 2017](https://www.wildoxfordshire.org.uk/stateofnature/) Report. They are some of the most important areas for wildlife where targeted conservation action can secure the maximum biodiversity benefits. Currently 36 CTAs cover just over 20 % of the county by area (526.2 km2) and contain 95% of the SSSI land area in Oxfordshire. They provide a focus for coordinated delivery of biodiversity work, agri-environment schemes and biodiversity enhancements through the planning system.
2. CTA’s should not be seen as planning constraint maps. However, consideration should in all cases be given to ensuring that development within a CTA does not increase the fragmentation of wildlife habitats within target areas or neutralize significant opportunities for habitat restoration or creation. Please refer to Cherwell Local Plan Policy ESD 11 and specific strategic site policies relating to CTAs, eg specifically, for Gavray Drive it is noted that while Bicester Policy 13 – Gavray Drive says “Development must avoid adversely impacting on the CTA and comply with Policy ESD11 to secure a net biodiversity gain”, Bicester Policy 12 – South East Bicester states “ the northern section of the site within the CTA should be kept free of built development”.
3. Where development does take place it should do so in such a way that delivers significant net gains for biodiversity. CDC needs to be certain that any development proposal will not damage existing designated sites (including local wildlife sites), but wherever possible enhance them and the wider area of ecological interest by protecting key features and taking opportunities to restore and enhance biodiversity.  This needs to be set out clearly in the ecological appraisal via robust ecological accounting of existing value and showing the how proposed development delivers a net gain.
4. CTA boundaries are not absolute. They have been drawn to follow mapped boundaries wherever possible to facilitate spatial planning and decision-making. However, a project immediately outside the mapped boundary should not be immediately dismissed if it would help to deliver the targets identified for the CTA concerned. It is also not the case that all land within a CTA offers the same opportunities for habitat restoration or creation.
5. Areas outside the identified CTAs still have substantial biodiversity interest, and include a number of nature reserves, Local Wildlife Sites, ancient woodlands and other areas of biodiverse and Priority Habitat. Although the focus of any biodiversity action should be on the CTAs, it will still be necessary to maintain, enhance, buffer and extend areas of wildlife habitat outside the mapped areas to maintain the wildlife interest and richness of the wider countryside.
6. Information provided on the habitats and species associated with each CTA is not definitive. Rather, it identifies those priority habitats for which the area is known to be most important, and provides a range of examples of priority species for which the area is known to be important. It is likely that each CTA will support additional habitats and species of principle importance for the conservation of biodiversity, and reference should be made to the Thames Valley Environmental Records Centre (TVERC) to support decision-making.
7. The key habitat in the Ray CTA is Lowland Meadow, a key feature in a number of Sites of Scientific Interest (SSSI) and Local Wildlife Sites (LWS) present. The CTA encompasses the alluvial floodplain of the River Ray extending along a number of small tributary streams and including some areas of land between these streams. This area extends into Buckinghamshire. The area extends onto the clay to included known areas of wet grassland and the main areas of ridge and furrow. For more details please refer to <https://www.wildoxfordshire.org.uk/wp-content/uploads/2014/02/Ray-CTA.pdf>. Loss of wet grassland habitat combined with predation impacts have led to dramatic declines in populations of some of our wading birds, including curlew *Numenius arquata* which showed a 51% decline in the Upper Thames area between 2005 and 2015, as referenced in the [State of Nature in Oxfordshire 2017 report](https://www.wildoxfordshire.org.uk/stateofnature/).

A proposal to designate (part of) Gavray Meadows a Local Nature Reserve has also been brought to our attention. Wild Oxfordshire supports the establishment of long term sustainable management of natural capital assets and the LNR mechanism is one of the very best ways to do this, especially in the urban context, and we would recommend this approach to CDC. It is increasingly acknowledged that access to the natural environment promotes good physical and mental health, encourages people to take exercise and sustains their participation in physical activity. One of the Key Actions included in the recent State of Nature in Oxfordshire report (2017) is to “Increase access to green space and volunteering opportunities, to keep people in touch with the health and well-being benefits of nature”. The creation of a LNR would contribute to this action.

Best Regards

Hilary Phillips

Biodiversity Programme Manager