



Steve Wheatley
Butterfly Conservation
Manor Yard
East Lulworth
Wareham,
Dorset
BH20 5QP
swheatley@butterfly-conservation.org
07919 861010

29th May 2018

Re: Gavray Drive Bicester (Appeal 3189611)

To Cherwell District Council and the Planning Inspectorate,

Rather than providing full Proofs of Evidence, Butterfly Conservation would like the following comments on the Environmental Statement (ES) to be considered as an addendum to our Statement of Case and for these to be brought to the Inspector's attention.

The Environmental Statement (ES) considers the proposed development site to be of limited ecological value but does not effectively address high ecological value of the adjoining land (Gavray Drive East). The ES does little to address the impacts of the proposed development on this area.

The ES admits the habitats following development are at risk of damage, disturbance, or deterioration as a result of the development and that these effects have the potential to be permanent (Section 9.5.20). The ES does not fully acknowledge the impacts of the development on the adjoining land and does not recognise the long-term impacts on habitat management of these areas. This factor was clearly mentioned in our Statement of Case (referring to Natural England Research Report NERR063, 2016). The ES acknowledges potential adverse effects but refers to only partial mitigation (Section 9.5.18).

ES Section 9.5.16 acknowledges that that permanent habitat loss will take place and the effect of the development will be adverse and permanent for the White-letter Hairstreak butterfly (a Section 41 species).

Although just a single White-letter Hairstreak butterfly was recorded in the development site (Gavray Drive West) during the 2013 survey, this is certainly not indicative of overall population size. The elms there were assessed to be of suitable quality for egg-laying and suggests that White-letter Hairstreak is using Gavray Drive West, likely as part of an inter-connected meta-population.

The ES does not acknowledge the significance of the butterfly assemblage which occurs in the area of Gavray Drive and its surroundings, and is known at only seven sites in the UK.

The ES assesses the single-species hedgerow (Blackthorn) to be of low value but Blackthorn is a critical species for Hairstreak species (Black and Brown) which form part of a highly significant species assemblage, as detailed in our Statement of Case.

We believe the approach taken by the Developer, and the decline in habitat quality that has already taken place in recent years (as acknowledged in the ES, Section 9.4.60 and Section 9.5.16) reflects an underlying failure of the Developer to take responsibility and positive action for the environment here.

In Summary

We feel the development proposal has not explored opportunities and options to significantly enhance the biodiversity of the natural environment of Cherwell District and will only partially mitigate (Section 9.5.18) negative impacts on an under-estimated range of significant features.

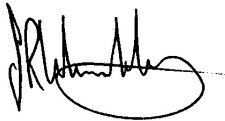
In accordance with the National Planning Policy Framework (NPPF), development should aim to conserve and enhance the natural environment. Any such development should deliver significant positive results for biodiversity and, as a result, for people.

It is our view that the approach adopted by the Developer and detailed in the Environmental Statement does not comply with the NPPF Chapter 11, Conserving and Enhancing the Natural Environment, and does not comply with Policy ESD 10 of the Cherwell Local Plan (“enhance biodiversity and the natural environment”).

Butterflies are widely accepted as an indicator of the health of the environment. It is our view that the proposed Development will have a medium and long-term negative impact on the diversity and abundance of key butterfly species and significant assemblages in the land adjoining the development. Therefore we believe this proposal would have an overall negative impact on the local environment of Cherwell District, also ultimately to the detriment the people that live there.

Butterfly Conservation has a long and proven history of delivering and helping to deliver habitat enhancement and creation for Lepidoptera. We remain keen to work with Cherwell District Council and others to ensure developments achieve these aims.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Steve Wheatley', with a large circular flourish at the end.

Steve Wheatley
Senior Regional Officer, South East England