



FAO: Caroline Ford
Planning Officer
Cherwell District Council
Bodicote House

4th July 2014

Dear Caroline

Planning application ref: 14/00005/SCOP; 14/00006/SCOP; 14/00007/SCOP
Application location: Various locations - NW Bicester
Scoping Opinion for development to provide residential dwellings, green space, a primary school, a secondary school, social and community facilities, an energy centre, commercial floorspace, amenity space and service infrastructure.

Thank you for consulting us on the above scoping opinion request. I have the following comments on behalf of the Berks, Bucks and Oxon Wildlife Trust. 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. This response refers to all three of the above applications.

Impact of proposed development

The EIAs should assess the impacts on Priority Habitats and Species, in addition to protected species (in line with paragraph 117 of the National Planning Policy Framework). The EIAs should also assess impacts on Local Wildlife Sites as well as statutory sites. Impacts at Local and Site level should be assessed in addition to those at District level and above.

The applicant **would need to demonstrate that a net gain in biodiversity would be delivered** (in line with the National Planning Policy Framework) using an accepted biodiversity metric in the EIAs.

The EIAs should be prepared following the CIEEM 'Guidelines for Ecological Impact Assessment in the United Kingdom' (2006). A data search from the Thames Valley Environmental Records Centre (TVERC) should be included as part of the desktop study to inform the scope of the EIAs.

The EIAs should take into account indirect impacts of development at this site on biodiversity in the wider area, including hydrological and air pollution impacts.

The EIAs must show how lighting across the whole site is designed to minimise the impact on wildlife, and in particular so as not to shine into wildlife corridors.

Appropriate management and monitoring of the site is crucial to whether the proposed development is able to succeed in delivering a net gain in biodiversity. The public areas

of the site would need to be managed for biodiversity in perpetuity to avoid the loss of potential benefits from the mitigation and enhancement measures. Ecological monitoring is important to ensure that the management is successful in meeting its objectives for biodiversity and to enable remedial action to be identified, if necessary. The EIAs should provide an outline of the proposed management and monitoring.

All EIAs should include an assessment of cumulative impacts on ecology, both direct and non-direct impacts within the site and off-site.

Delivery of biodiversity enhancements

Enhancements in biodiversity should be built into the design from an early stage on various scales, including individual house design. Features for biodiversity within the site should be planned to link up to habitats and features in the surrounding landscape. The EIA should demonstrate whether best practice has been followed, as suggested in the Oxfordshire Biodiversity & Planning Guidance.

Opportunities to include biodiversity within the built development should be maximised. In addition to green spaces this should include as many as possible of the following:

- SUDS schemes/balancing ponds to be designed so as to maximise their biodiversity value
- Bat and/or bird boxes within the fabric of buildings
- Green rooves on buildings where possible
- Street trees, and fruit trees in gardens
- Native wildflower meadows and other wildlife habitats within the street environment, ideally within gardens and also within the grounds of any public buildings.

Contribution to ecological networks (see NPPF paragraph 109)

The outcomes of the ecological surveys should be used to inform and develop appropriate biodiversity enhancements, in addition to any compensation that is necessary. One source of information that should be used to inform the location of any off-site biodiversity compensation and enhancements is the Conservation Target Areas (CTAs). In Oxfordshire CTAs have been identified by the Biodiversity Partnership. These are considered to be the most important areas for wildlife conservation in Oxfordshire. Key areas where targeted conservation action will have the greatest benefit. The main aim within CTAs is to restore biodiversity at a landscape-scale through the maintenance, restoration and creation of priority habitats. CTAs provide a key focus for delivery of the Oxfordshire Biodiversity Action Plan (BAP).

The proposed development lies close to several CTAs. Further details and maps are available from:

<http://www.oncf.org.uk/biodiversity/cta.html>

Scope of Surveys

The selection of appropriate surveys should be informed by a desk-top survey, including a request for existing records from the Thames Valley Environmental Records Centre (TVERC), and other local groups who may hold existing information (BBOWT submits all

its records to TVERC). The phase 1 habitat survey, which we understand has already been undertaken, should also inform the need for further survey work.

The scope of surveys should not only include features receiving statutory protection, but should also pick up on species and habitats listed by the Secretary of State as being of principal importance under section 41 of the NERC Act 2006. As such, botanical surveys should identify habitats of principal importance. Further assessment may be needed to determine the value of some habitats on site, especially any habitat where the defining features are not only botanical.

Species surveys should be designed to identify species of principal importance using the site, in addition to protected species. The need to conserve species and habitats of principal importance is stated in paragraph 117 of the NPPF as follows:
“promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets”

Timing of surveys: it is important that all potential biodiversity impacts and enhancement opportunities are informed by full survey information. Surveys should be undertaken at the optimal time of year for each species using the best practice methodology. It would be particularly useful for surveys to identify any existing wildlife corridors connecting to features within the wider countryside, for example watercourses, ditches, hedgerows and railway embankments so that these can be taken into account in the design of the restoration and aftercare schemes.

Should you wish to discuss my comments further, please contact me. I would be grateful if you could send me a copy of the decision notice for this scoping opinion once available. I would also request that the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) be consulted once the Environmental Statement has been produced.

Yours sincerely,

Neil

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