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Matthew Parry
Planning Officer
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By Email

15 February 2017

Dear Mr Parry

16/02586/OUT Bicester Gateway Planning Application

I am writing on behalf of the Banbury Ornithological Society (BOS) in my role of Conservation Officer.

Founded in 1952, the Banbury Ornithological Society (BOS) studies the bird life in the twelve 10km squares surrounding Banbury which includes parts of Northamptonshire, Oxfordshire and Warwickshire (see [BOS area map](#)). Fieldwork is the core of BOS activity but the Society also holds regular monthly meetings, publishes a monthly Newsletter and Annual Reports, manages seven nature reserves and is pro-active in local conservation matters.

We wish to comment on this planning application due to the proximity of the proposed development to the Bicester Wetland Nature Reserve Local Wildlife Site (LWS) managed by our Society in collaboration with Thames Water.

We are very concerned that the development of Bicester Gateway (and Graven Hill on the other side of the valley) is starting to surround the LWS and is potentially damaging to the ecological network within which the nature reserve sits, as well as the potential for direct impacts (e.g. disturbance, run-off). **Our aspiration would be for the whole development to be enabled in a way that delivers a net gain in biodiversity.**

We understand that this this proposal is Phase One of a larger overall development that is covered by Policy Bicester 10 in the local plan. The Ecological Assessment carried out as part of the application states the policy includes:

7.3.2. It is noted that the application site forms the westernmost part of a Strategic Development site – Policy Bicester 10 (Bicester Gateway). Policy Bicester 10 make specific reference to:
“Adequate investigation of, protection of and management of priority and protected habitats and species on site given the ecological value of the site, with biodiversity preserved and enhanced. An ecological survey should be undertaken, investigating the cumulative impacts of development at this site and at other sites on the Local and District Wildlife Sites in the vicinity”

We have not yet seen a Masterplan for Bicester 10 or an ecological study that investigates the cumulative impacts of development at this site, so it is hard to evaluate the impact of this proposal in line with this Policy.

We are aware that there is a District Wildlife Site (DWS), Promised Farm Meadows, adjacent to the development site and as far as I can tell this was not identified in the Ecological Assessment. The site code number is 52Q01. It is recorded as 6.41 hectares with key habitat characterised as lowland meadow. This DWS site connects the area proposed for development to the Bicester Wetland Reserve and as such, the application site comprises part of an ecological network that supports locally important wildlife.

We note that the Ecological Assessment was carried out about a year after a major clearance of scrub from the site, which may explain why the flora includes many ruderal species such as thistles and teasel. It would have been good practise to carry out the ecological survey prior to initiating site clearance.

We are surprised that the habitat was identified at Semi-improved Grassland given the recent history of management of the site which appears to have been unmanaged grass, scrub and woodland. The Ordnance Survey map coverage plots the area as woodland, and recent aerial photography shows the site (prior to recent clearance), as a mixture of grassland, scrub and tall hedgerows. This habitat type has potential to be of significant conservation interest and we would like to have seen some evidence of investigation into past management. A single survey visit in April would also not be sufficient to pick up potential botanical and butterfly (hairstreak sp.) interest at this site.

In order to fully assess the impact of the development on the important local ecological interest we wish to see more thorough ecological appraisal for the whole of Bicester 10 that is set in the context of a masterplan for the whole site, with the cumulative impacts are assessed..

Yours sincerely

Mike Pollard