

The Lodge
1 Armstrong Road
Littlemore
Oxford OX4 4XT

FAO: Matthew Parry
Cherwell District Council

By email only

15th February 2017

Dear Mr Parry,

Location: OS Parcel 2200 Adjoining Oxford Road North Of Promised Land Farm Oxford Road Bicester

Application Reference: 16/02586/OUT

Proposal: Phase 1 of the proposed new business park ("Bicester Gateway") comprising up to 14,972 sqm (Gross External Area) of B1 employment based buildings, plus a hotel (up to 149 bedrooms), with associated infrastructure, car parking and marketing boards.

Thank you for consulting the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) on above 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.

BBOWT has no principle objection to the site being developed but would like to issue a HOLDING OBJECTION on the following grounds:

- **Cumulative ecological effects not assessed**
- **Net gain in biodiversity not demonstrated**

BBOWT has no principle objection to development on this site but we are concerned that the ecological effects of the development on designated sites and species are assessed for this first development phase only rather than comprehensively for the Bicester 10 site as a whole and in the wider development context.

The development affects the most westerly part of the larger strategic development site of Bicester 10, latter of which extends eastward up to the Bicester Wetland Reserve LWS (Local Wildlife Site) encompassing the District Wildlife Site of Promised Land Farm.

An ecological survey has been carried out by Ecology Solutions Ltd for this application. The survey did not find any protected or notable habitats or species on site or immediately adjacent to the site. The report does also not identify any significant adverse effects on the nearby LWS

(Local Wildlife Site). I don't question the findings of the survey but consider it insufficient to assess the effects of this development in isolation.

Future development phases of Bicester 10 will include the grasslands of Promised Land Farm up to the boundary of the LWS bringing development close to the reserve. I am concerned that it is proposed to assess the impacts on the LWS as part of future development phases rather than considering effects comprehensively and cumulatively at this stage. This is in line with Bicester 10 policy, which states amongst other things: *"...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. ..."*

In addition, other strategic development sites are located to the north (Bicester 4) and northeast (Bicester 2 – Graven Hill) of the LWS, so that the reserve might be almost completely surrounded by development in the future. I am concerned about the effects this might have on the ecological interest of the LWS and the ability for it to be managed for nature conservation in the future. I consider it important that the effects on this site are comprehensively assessed.

Net gain in biodiversity

In accordance with para 109 of the NPPF (National Policy Planning Framework) and policies ESD10 and Bicester 10 of the Cherwell Local Plan, development on this site should achieve a net gain in biodiversity. Being mindful of the current nature of the site and in the absence of information that clearly demonstrates a net gain I am unconvinced that a net gain is currently being achieved.

Experience elsewhere has shown that use of Biodiversity Accounting Metrics such as the ones developed by Defra, the Environment Bank or Warwickshire County Council can be useful in quantifying losses and gains in biodiversity to check that a net gain is being achieved. The applicant should check with the local authority ecologist which metric to use.

Related to above point I have found little evidence of biodiversity being integrated into the development. In accordance with Local Plan policy ESD14 and paragraph 118 of the NPPF, which encourages opportunities to incorporate biodiversity in and around developments I would expect a development in this location (gateway location, Bicester Eco town) to set exemplary standards for biodiversity in built development. This could include green roofs, green walls, sensitively managed native street trees, diverse road verges, and the incorporation of integral wildlife boxes where possible. Such measures will not only benefit wildlife but also create a much better environment for people, and provide wider "ecosystem service" benefits. Whilst many of these measures are detailed design considerations it is important that the principles are secured at outline stage to enable these to happen.

Management

Related to above point I consider it important that appropriate funding for any potential long-term management of open spaces, vegetation and biodiversity features is secured at outline application stage. This should be secured via a legal agreement (e.g. a S106 agreement) as part of any potential planning consent. Management should cover the lifetime of the development or a minimum of 25 years. Appropriate management measures and responsibilities should be outlined

in a Landscape and Ecological Management Plan (LEMP), which should be provided at reserved matters planning stage.

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,

Haidrun Breith

Haidrun Breith
Senior Biodiversity & Planning Officer (Oxfordshire)

haidrunbreith@bbowt.org.uk