



The Lodge  
1 Armstrong Road  
Littlemore  
Oxford  
OX4 4XT

Cherwell District Council Planning  
Fao: Matthew Parry

**By email only**

30<sup>th</sup> January 2018

Dear Mr Parry,

**App 17/02534/OUT | OUTLINE - The construction of a business park of up to 60,000 sq.m (GEA) of flexible Class B1(a) office / Class B1(b) research & development floorspace; parking for up to 2,000 cars; and associated highways, infrastructure and earthworks | Land North Of Bicester Avenue Garden Centre Oxford Road Bicester**

The above application has been brought to our attention. As a wildlife conservation charity, our comments relate specifically to the protection and enhancement of the local ecology on and around the application site.

These comments are based on the information provided in the ecology chapter and associated appendices of the Environmental Statement as well as the Design & Access Statement (DAS).

We note that the Council's internal ecologist has provided detailed comments on protected species and habitats, which we support. This response does therefore not include further comments on these issues.

We have no principle objection to development on this site but consider the application to provide insufficient information on a number of issues which are outlined below. We would therefore like to register a **Holding Objection** on the following grounds:

Potential impact on the Bicester Wetland Reserve Local Wildlife Site (LWS)

The Bicester Wetland Reserve Local Wildlife Site (LWS) is located downstream from the application site and hydrologically connected with it. The LWS comprises priority habitats of grazing marsh and reed beds, both of which are dependent on hydrological flows. The proposed development comprises considerable amount of building and hardstanding as well as the removal of ditch D1, all of which has the potential to adversely affect the hydrology and habitats in the LWS. We have not been able to find any information that ecological impacts on the LWS have been adequately assessed to ensure that adverse effects are avoided as required by the NPPF and local planning policy (policies ESD10, Bicester 4). An assessment of the effects on the LWS should be carried out prior to determination.

### Sustainable Urban Drainage System (SUDS)

Parts of the application site are located in flood zone 3. The Design & Access Statement states that no buildings will be located within the flood zone, however, the development comprises large amounts of buildings and hardstanding, which can adversely affect surface water flows and infiltration within the site and its surrounds. The DAS makes reference to Sustainable Urban Drainage Systems (SUDS), which is welcomed, but no detail is provided. SUDS offer opportunities not only to address flood risk but also to enhance biodiversity, eg through the use of green roofs, planted swales and native species planting. SUDS should be considered as an integral part of the design from the outset and we recommend that further detail is requested at this stage in the planning process.

### Net gain in biodiversity

National (NPPF) and local policies (ESD10) require major developments to achieve a net gain in biodiversity. The Indicative Masterplan shows the majority of the application site being taken over by buildings and hardstanding, interspersed with smaller areas of largely formal landscaping. A narrow strip of wildflower meadow is proposed at the eastern edge.

We are unconvinced that the proposed development will deliver a net gain in biodiversity as required. The Biodiversity Impact Assessment Calculator (BIAC) is an accepted and useful tool in quantifying losses and gains in biodiversity and should be requested prior to determination.

The Planning Boundary Plan in the ES shows that the remainder of the arable field and the meadow east of the stream are also in the applicant's ownership. The flood map and aerial photograph suggest that these areas are prone to flooding and that the eastern field is not as intensively farmed. We believe that with the right management these areas could offer a real opportunity for habitat creation to deliver green infrastructure and biodiversity benefits as required by local planning policy (Bicester 4, ESD10). We therefore recommend that habitat creation and management of these areas for biodiversity is requested as mitigation for the ecological impact of the application.

We also recommend that a Landscape and Ecological Management Plan (LEMP) is requested for all soft landscape areas within the blue line area.

### Skylark mitigation

We agree with the Council's ecologist that the skylark plots next to the car park are unlikely to work and are therefore inadequate as mitigation for these farmland birds. Off-site compensation for farmland birds especially skylark is required and should be secured via a condition and/or legal agreement.

### Management

We could not find any information with regard to management of the application site and blue line areas. We consider it important that long-term management of the site and any ecological/green infrastructure areas is secured through a legal agreement at outline planning stage as this might be the only time when the development is being considered in its entirety.

Please do not hesitate to contact us if you require any further information.

Yours sincerely,



Haidrun Breith

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