Rachel Tibbetts

From: DC.Consults
Sent: 03 June 2020 10:46
To: DC Support
Subject: FW: 18/00825/HYBRID-Ecology comments

Carolyn Mangnall
Development Support Supervisor
Cherwell District Council
Direct Dial: 01295 221871
carolyn.mangnall@cherwell.gov.uk
www.cherwell.gov.uk
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From: Andrew Lewis <Andrew.Lewis@Cherwell-DC.gov.uk>
Sent: 03 June 2020 10:29
To: DC.Consults <DC.Consults@Cherwell-DC.gov.uk>
Subject: FW: 18/00825/HYBRID-Ecology comments

Please register and put on def

From: Charlotte Watkins <Charlotte.Watkins@Cherwell-DC.gov.uk>
Sent: 02 June 2020 08:16
To: Andrew Lewis <Andrew.Lewis@Cherwell-DC.gov.uk>
Subject: 18/00825/HYBRID

18/00825/HYBRID
Heyford Park, Camp Road, Upper Heyford, Bicester OX25 5HD

Andrew
Regarding the above application, Paul Evans gave extensive comments previously on the ES and many of those regarding the larger issues on site still stand in light of the updated supplementary information. For example the proposal does not accord with Policy to protect the LWS as part is being lost.. The ES still relies heavily on the production of a LEMP to fill in some of the gaps. There is more information on the grassland creation process which is proposed though I would agree with Natural England and past comments that it would be much better for the compensatory grassland to be on the other side of the site given the additional benefits this would bring in terms of connectivity. Is there any chance of that scenario? Has the compensatory land been secured? It is mentioned within the ES (as in it would be best) but it does not state why this is not possible. This would help the site adhere to the aims of the new CTA designation.

There seems doubt about whether the use of retained Priority grassland areas for the destination park and filming will result in a permanent adverse effect on those habitats through degradation and what this means for the species which rely on them. The long term impacts of the filming activities in particular still seems vague as it does not state what form they may take or the frequency. Whilst some already occur and there is the intention to run risk assessments past the LPA and restrict timing it seems clear that there will be some level of disturbance and risk to biodiversity which could be considered unacceptable. Depending on what is used (pyrotechnics, water etc..) this may have a significant effect on habitats regardless of the time of year. Each type of activity will need to be assessed to see whether it is a desirable use of the LWS. Active discouragement of visitors straying from paths or allowing dogs to do so should be considered. Formal paths alone may be not be sufficient.

The site habitat biodiversity value is calculated as 1976.82 with an overall proposed gain of 10.84 biodiversity units on site. If I am calculating this correctly this would only give a net gain of 0.5% overall which is very low (CDC currently have an agreement through executive committee to seek gains of at least 10% from development). This is also still reliant on the achievement of good or moderate condition for the created grassland within 10 years (or 15 if they begin 5 years before loss as stated) which is ambitious for this type of habitat. A gain of this level leaves very little room for contingency before an overall loss would be seen. There should be an expectation of further net gains in habitat either on or off site.

I did not find reference within the ES to additional enhancements for biodiversity such as integrated features for swifts, sparrows or bats within any new buildings (I may have missed these or they may be within or proposed in documents elsewhere?). CDC seeks the equivalent of one such provision per new dwelling (albeit these may be best clustered in certain localities). Integration should be favoured as opposed to bolt on boxes as it assures the retention for the lifetime of the development.

Regarding our previous discussion on the locations of the cat-proof fencing I note it is still proposed as the primary mitigation against the projected increase in predation on birds, reptiles and great crested newts from domestic cats. This is still noted within the supplementary information. Is there a further update which removes this measure and led to your mentioning it? Whilst fencing is not always desirable for a number of reasons if it is not to be put in then the impact of predation should be reconsidered with other options.

Please get back to me to discuss any of the above. Recommended conditions will follow in due course
Kind regards
Charlotte

Dr Charlotte Watkins
Ecology Officer
Tel: 01295 227912
Email: Charlotte.Watkins@Cherwell-DC.gov.uk
www.cherwell.gov.uk

My usual working hours are: Monday and Wednesday mornings.

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