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**By email only**

4<sup>th</sup> July 2018

Dear Andrew,

**Location:** Heyford Park Camp Road Upper Heyford Bicester OX25 5HD

**Application Reference:** 18/00825/HYBRID

**Proposal:**

Demolition of buildings and structures as listed in Schedule 1; Outline planning permission for up to 1,175 new dwellings (Class C3); 60 close care dwellings (Class C2/C3); 929 m2 of retail (Class A1); 670 m2 comprising a new medical centre (Class D1); 35,175 m2 of new employment buildings, (comprising up to 6,330 m2 Class B1a, 13,635 m2 B1b/c, 9,250 m2 Class B2, and 5,960 m2 B8); 2.4 ha site for a new school (Class D1); 925 m2 of community use buildings (Class D2); and 515 m2 of indoor sports, if provided on-site (Class D2); 30m in height observation tower with zip-wire with ancillary visitor facilities of up to 100 m2 (Class D1/A1/A3); 1,000 m2 energy facility/infrastructure with a stack height of up to 24m (sui generis); 2,520 m2 additional education facilities (buildings and associated external infrastructure) at Buildings 73, 74 and 583 for education use (Class D1); creation of areas of Open Space, Sports Facilities, Public Park and other green infrastructure; Change of Use of the following buildings and areas: Buildings 357 and 370 for office use (Class B1a); Buildings 3036, 3037, 3038, 3039, 3040, 3041, and 3042 for employment use (Class B1b/c, B2, B8); Buildings 217, 3102, 3136, 3052, 3053, 3054, and 3055 for employment use (Class B8); Buildings 2010, 3008, and 3009 for filming and heritage activities (Sui Generis/Class D1); Buildings 2004, 2005 and 2006 for education use (Class D1); Buildings 366, 391, 1368, 1443, 2007, 2008 and 2009 (Class D1/D2 with ancillary A1-A5 use); Building 340 (Class D1, D2, A3); 20.3ha of hardstanding for car processing (Sui Generis); and 76.6ha for filming activities (Sui Generis); the continuation of use of areas, buildings and structures already benefiting from previous planning permissions, as specified in Schedule 2; associated infrastructure works including surface water attenuation provision and upgrading Chilgrove Drive and the junction with Camp Road.

Thank you for consulting BBOWT on this 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.

### **Impact on Upper Heyford Airfield Local Wildlife Site (LWS)**

The proposed development will result in the direct loss of 7.1ha (just under 10%) of the Upper Heyford Airfield LWS. We are unclear whether this includes the area lost to the perimeter walk but in any case this is an increase from previous proposals. It is our understanding that this increase is due to heritage constraints elsewhere but we have found no explanation why it is deemed acceptable to increase the impact on the LWS considering that damaging it is against policy.

Policy ESD10 of the Cherwell Local Plan requires development to achieve a net gain in biodiversity and to avoid adverse impacts on LWS. It states amongst other things:

*“... Development which would result in damage to or loss of a site of biodiversity or geological value for regional or local importance including habitats and species of principal importance for biodiversity will not be permitted unless the benefits of the development clearly outweigh the harm it would cause to the site, and the loss can be mitigated to achieve a net gain in biodiversity/geodiversity.”*

It is therefore our view that impacts on the LWS should be avoided in the first instance and will only be accepted if the benefits of the development clearly outweigh the harm and deliver a net gain in biodiversity. Our comments on biodiversity gain are outlined below. It should also be noted that the development will not only directly affect the LWS but will also adversely affect priority grassland habitats outside the LWS, which should be avoided by policy.

### **Net gain in biodiversity**

Both the NPPF and the Cherwell Local Plan require development to achieve a net gain in biodiversity. We welcome that a Biodiversity Impact Calculator (BIAC) has been submitted to assist with this assessment process. We are generally supportive of the use of BIAC, however, it is our view that it can only be a tool and cannot give the complete answer as it does not take account of other important factors such as protected/notable species interest or connectivity.

The development comprises the loss of priority habitat, which according to policy should be avoided. It is suggested to compensate for this impact and to achieve a net gain in biodiversity through the creation of 30.82ha of un-improved calcareous grassland on currently arable land West of the air field. The feasibility of this proposed habitat creation has not been informed by any ground investigation and all details are proposed to come forward as part of a LEMP (Landscape & Ecological Management Plan), which is recommended to be conditioned.

Whilst we welcome the creation of high quality grassland habitat we consider it extremely unrealistic to create unimproved calcareous grassland of good condition (as stated in the calculator) from arable within 10 years especially without any knowledge of ground

conditions or having the right management in place. As managers of many grassland sites it is our experience that the creation of unimproved grassland on nutrient-rich soils is a complex and time-consuming process that requires considerable thought from the outset. Management could be further complicated should the proposed fields be subject to indirect pressure from informal recreation (eg dog walking) and/or pets.

As the development relies heavily on the creation of this habitat to achieve a net gain in biodiversity the proposal calls into question whether a net gain in biodiversity will be achieved.

BBOWT is unconvinced that a net gain in biodiversity will be achieved by the development proposals based on the BIAC and also with regard to the protected and notable species ensemble, which will be impacted on by the proposal. We therefore consider the development to be in conflict with policy ESD10.

In addition we consider the compensatory fields to be at the wrong end of the airfield. We are aware that the location of the compensatory habitat is driven by land availability but from an ecological point of view it is important that habitats are created in the places where they are connected and enhance ecological connectivity. The proposed fields are currently not very well connected with the priority habitats in the LWS unless appropriate management happens across the whole application site to improve habitat diversity across the whole flying field.

As mentioned in our previous comments we believe that the most significant ecological benefits could be achieved by improving the quality of the remaining LWS through appropriate management and by improving the ecological connectivity between the application site, the northern bomb stores and Ardley Cutting & Quarry SSSI to the northeast of the application site to enhance ecological connectivity for a wide range of species including great crested newts.

### **Impact on habitats and species**

The ES assesses in chapter 8 the likely effects of the proposed development on habitat and species. We consider some of the impacts to be greater than stated for example with regard to the impact on the LWS, other grassland habitats within the site (eg parcels 28 and 29) and on breeding birds in particular curlew.

The application provides only limited detail but we are under the impression that parcels 28, 29 and potentially also 27 will be subject to increased activity. This is in addition to all the new residential areas and the Creative City which will also be subject to increased activity as well as lighting and noise.

We consider that increased access and activity in the proposed Flying Field Park (parcel 28) and Core Visitor Destination Area (parcel 29) will adversely affect the unimproved and semi-improved neutral grassland habitats and wildlife (eg breeding birds, invertebrates) in these areas. Based on our experience elsewhere we also don't believe that these effects (eg caused by dog walking) will be able to be fully mitigated through signage and footpath network creation as suggested resulting in a permanent adverse effect on the habitats and species in these areas.

The application also includes a number of activities that are difficult to assess in the absence of further detail. For example the impact of the observation tower and zip wire (in which direction is this proposed to run?) as well as the the filming area is unclear. All of these could potentially have significant effects on adjacent habitats and wildlife through disturbance, lighting, noise, trampling.

We are aware that filming already happens on site but it is not clear whether the proposals comprise a more intensive use than currently exists. We note that it is proposed to carry out an Environmental Risk Assessment for each filming project as part of the LEMP, which will require the approval of the LPA. Whilst the intention is welcomed it is difficult to know whether this is realistic and feasible considering that restrictions would apply for considerable periods of the year.

Great Crested Newts (gcn): the breeding population of gcns that has been found on the application site forms part of a significant metapopulation of gcns on the LWS and the northern bombstores. We believe that it is possible to mitigate the impact on gcns but we are not convinced that all proposed new ponds are in right location to ensure that gcn commuting routes are not adversely affected.

Curlew and other breeding birds: Curlews have been found nesting on the application site. The proposed increase in activity as well as proposed planting of shrub belts will adversely impact on curlew and other breeding birds. We are also not convinced that the proposed new grassland will provide sufficient compensatory habitat for all the breeding birds especially if it is subject to recreational pressure and pet predation. It is also our experience that curlews prefer meadows to calcareous grassland so are unlikely to use the compensatory grassland.

### **Ongoing management**

Management of existing and new habitats will require appropriate management to ensure ecological benefits in the long term. We have found no information on management and it seems that much detail is proposed to be provided through the LEMP or at detailed application stage. We consider it important that an LEMP is drawn up and secured at outline stage to ensure the long-term management of new and existing habitats and features. This should not only include the LWS and priority habitats but the grasslands within the airfield with a view to improve ecological connectivity between the compensatory habitat and the LWS should the development be permitted. It is also important that the management is accompanied by appropriate funds, which should be secured via a legal agreement.

I hope that these comments are helpful. Should you wish to discuss anything further, please do not hesitate to get in touch.

Yours sincerely,

*Haidrun Breith*  
Haidrun Breith

Senior Biodiversity & Planning Officer (Oxfordshire)

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