

From: Danielle Berry <Danielle.Berry@cotswold.gov.uk>

Sent: 16 January 2023 13:56

To: David Ditchett <David.Ditchett@westoxon.gov.uk>

Subject: 22/03240/OUT further information required

Hi David,

I've reviewed the ecological report submitted for the above application and have the following comments:

Biodiversity Net Gain

Section 1.1.12 states 'the sites baseline is 22.01 biodiversity units for habitat areas and 5.74 for linear feature. Current proposals result in a net gain of 13.10% in habitat areas and a gain of 44.31% for hedgerows.' There are other references made in the report regarding biodiversity net gain, including a reference to RSE_4967_BIA, biodiversity impact assessment metric however, I've been unable to locate this document on the file. At present I am unable to assess whether the proposed development will result in a measurable biodiversity net gain. Please can you ask the applicant to submit the following documents as per the guidance note on WODC's website:

The Defra Biodiversity Metric 3.0 should be used to measure the level of net gain that would result from the proposed development. For all major applications, the following evidence must be submitted (in line with the council's online guidance note):

a) Biodiversity Impact Plan. This can be produced using the information from the Preliminary Ecological Appraisal or Ecological Impact Assessment. It should clearly show the areas covered by each of the existing habitat types and the area in hectares of each habitat type (or for each habitat parcel, as some habitats may be scattered throughout the site). This can be submitted as an image file, GIS data (e.g. Esri.shp) or CAD (.dxf) file.

b) Proposed Habitats Plan. This can be taken from the site layout plan, illustrative masterplan, green infrastructure plan or landscape plans (if they are available). The plan should clearly show what existing habitat types are being retained and enhanced, and what new habitat types will be created; it should be colour coded so that each habitat type is easily identifiable and the area of each habitat type should be quantified in hectares. Other proposed biodiversity enhancements should also be shown on this plan. As above, this information can also be submitted as an image file, GIS data (e.g. Esri.shp) or CAD (.dxf) file.

c) A full copy of the spreadsheet, detailing the Biodiversity Metric: The information in the metric should be directly related to the Biodiversity Impact Plan and the Proposed Habitats Plan. The completed spreadsheet or the full calculations included in the metric should be submitted and not just a summary. Detailed justifications for the choice of habitat types, distinctiveness and condition should be added to the comments column or provided separately in a report.

The BNG assessment can be included as a section (e.g. a chapter) of the EcIA report or as a separate report.

In summary, to carry out a robust assessment of the metric calculations, all of the above information is required. This includes the original metric spreadsheet as well as the site and

habitat data (pre and post development) in a GIS format. This information does not yet seem to have been fully supplied and therefore is required.

I note there are existing and proposed site plans included in the report however, the areas of each habitat type have not been included.

Habitats

I have concerns regarding retained hedgerows, the report repeatedly states hedgerows will be retained however, some removal must be required in order to facilitate access to the site and between the two fields (this can be seen on the illustrative masterplan). Sections to be removed should be inputted to the BNG metric to ensure the proposed net gain in hedgerow units is accurate and precise.

Furthermore, can the applicant confirm trees will not need to be felled in order to facilitate access to the site.

Local Wildlife Site

The report states 'public footpaths that lead from the development site towards the LWS should be signposted detailing important information pertaining to the LWS to try and reduce trampling pressures.' Please can the applicant confirm whether signposting will be incorporated into the site to limit the effect of recreational pressure, this can be dealt with via a condition.

Protected Species

Overall, I am satisfied with the level of survey effort however, section 4.4.5 states skylarks were recorded during the survey but there is no additional detail pertaining to their behaviour. Please can the project ecologist confirm whether the skylarks were on or adjacent to the site, the number of individuals and what behaviour the skylarks were exhibiting.

Please can you re-consult biodiversity once we've received the outstanding information.

Thanks,
Danni

Danielle Berry
Biodiversity and Countryside Officer

