To: Susannah Mangion

Ref P19/V0696/FUL- Louie Memorial Pavilion

Date 13/04/2019

From Oxfordshire Badger Group c/o 29 Webbs Way , Kidlington, Oxon OX5 2EW

Member of the Badger Trust. Registered Charity 111440

Dear Susannah,

The Oxfordshire Badger Group object to the planning application to build a multi-use building and carpark to replace the existing Pavilion and Scout Hut on the Louie Memorial Fields, North Hinksey, as we believe that the development will have a detrimental impact on the natural environment, comprimising an important wildlife corridor which provides connectivity for wildlife from the Local Wildlife site. There is a lack of proof of gain in biodiversity on this fragile Open Space, Green Belt site and the proposed building contravenes the Vale’s Green Belt Policy; (Core policy 13- The Oxford Green Belt)

**Comments on the Ecological Appraisal, November 2018**

The Ecological appraisal by Bioscan carried out in November 2018 states in 11.4 that the secondary aim of this report is to collate and summarise existing ecological baseline. This means that a lot of the data in the report is many years old and second hand. The report is based on drawing No 401 Rev P2 – a joint building with no scout Hut. The Scouts want to retain their Scout hut and the building is no longer for joint use. The building does not therefore meet its original brief.

A hydrology survey was not carried out despite the fact that there is a rare alkaline fen in the Local Wildlife site in the lower LM Field which could be impacted by the increase in hard standing and the massive increase in volume of the new build. There is a complex system of subterranean flows from the Fields into the fen and these demand a specialist report. It seems a hydrologist, Curt Lambeth was asked for his view via email (4.10/18) which is not included in the report. He comments on the ’net surface increase in hard surface’ that ’any increase in the area of impermeable surfaces/ activities could lead to an increased compaction which should be avoided’ The report states that ‘if the catchment becomes increasingly impermeable the rate of surface run off makes the risk of flooding greater. Any impact would impact on the Local Wildlife site and its associated invertebrates’. The hydrologist makes mitigation suggestions in his email of 4/10/18 but ,with a nationally important fen at risk, an independent hydrology report is a necessity rather than second hand reporting and should have been commissioned before the application was submitted.

As the Parish Council has obviously been keen to push this controversial application through before the local elections, the Ecological report was carried out at the wrong time of the year to look at invertebrates and reptiles. It should have been done between June-September. The report is therefore outside the optimal period and will not be completed until a further report of the fen which we understand is planned, is carried out.

**Hedgerows and Impact of lighting in relation to the wildlife corridor**

The wildlife corridor which runs from the Copse in the Lower LM Field along by the existing Scout Hut on the upper LM Field is crucial for a variety of wildlife including badgers and deer. The proposed much larger new building will impact on this. Protection by hedgerows from light spillage and disturbance is therefore essential. The hedgerows were assessed against their ability to meet criteria ( Hedgerow Regulation 1117) and whether they were important but wildlife corridor qualifies as important(HP1) In 5.1.14 it is stated that all hedgerows and scrub are expected to be used by nesting birds. They are of value as they provide a natural and well established barrier for the wildlife corridor. They contain a mixture of hawthorn, ash, elder and blackthorn and should be retained. The hedgerows should be retained to protect the wildlife corridor from the consequences of development on this site. New planting will not be adequate, especially with the increase in disturbance and light pollution the new development will bring. There will be inevitably be some form of lighting on the new building to discourage vandalism ,which has been an ongoing problem on the Fields. Flood lights to the MUGA will also spill over to the edge of the wildlife corridor. There is a suggestion that the Wildlife corridor should be wider. It is unclear if this has been put into the plans. If not, this should be a condition of any development on this site. We are not assured that the necessary safeguards are in place to protect the wildlife corridor.

**Badger Report**

No attempt has be made by the developer or the ecologists to contact OBG or local wildlife experts for information about wildlife habitats, to better understand how the ecology of the Fields can be seen in relation to the wider area. The report can therefore only be seen as a snapshot of the Fields and not a detailed study of the wildlife and the inter-relatedness of the habitats and movements. The impact of developing the upper LM Field on the habitats and ecology has been underestimated and the data is incomplete. The Fields are of importance to badgers for foraging and connectivity with surrounding areas. The ecological appraisal has failed to reflect this.

**Sustainability**

The proposed development fails to meet the criteria for sustainability. The Co2 emissions associated with building materials is substantial and little attempt has been made to make the building carbon neutral. With its position on top of a Hill with southern aspects, PV panels could have been adopted. The increase in car traffic and emissions which a development on top of a steep Hill on the edge of the Parish will inevitably bring, is unacceptable. Increase in the volume of traffic could also lead to wildlife being killed as they cross the road as they move along the wildlife corridor

**Lack of proof of gain in biodiversity**

It is difficult to see what gain and offset there will be in biodiversity with the increase in footprint (325sqm to 500sqm) and volume with the proposed pitched roof of the new building .The Green Belt location and openness of the area will be compromised and dominated by this building. The Fields because of their position in relation to housing and open countryside need to have an undisturbed wildlife corridor and thriving woodland and fen to sustain the rich variety of species. Future plans for a skatepark will further urbanise the area which could have a detrimental impact on the character and ecology of the area and compromise the way it is used by parishioners, for informal recreation.

Oxford Badger Group object to this proposed multi use building on Green Belt and Open Space, as we believe it will have a detrimental effect on the natural environment and wildlife, including protected species. A more sustainable, smaller scale building to replace the existing Pavilion which respects both the Open Space and Green Belt which the proposed development does not, will benefit both the wildlife and the local community.

OBG.