

Our ref: W4361_let_White Cross Farm_06-06-22

Your ref: Land at White Cross Farm, Wallingford



Ecological Consultancy for Planning
Research & Development

Simon Heaton
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by email only

6th June 2022

Dear Simon,

Re: Request for Clarification – Proposed Sand and Gravel Extraction at Land at White Cross Farm, Wallingford

I am writing to you with regard to the request for clarification (Reference: MW.0115/2) sent on 17/05/2022, from Oxfordshire County Council with respect to the proposed sand and gravel extraction at Land at White Cross Farm, Wallingford. The response is as follows:

“Before I complete my response, please can you ask the applicant for clarification regarding the Biodiversity Metric calculations. Under the Trading Rules where a High Distinctiveness Habitat is lost it would need to be replaced with the same habitat on site (or elsewhere, such as within the Conservation Target Area, if onsite is not possible). Grassland – Floodplain Wetland Mosaic (CFGF) is a High Distinctiveness habitat and the Trading Summary in the Biodiversity Metric shows a net loss of this habitat. However, the Ecological Appraisal (Windrush Ecology, August 2021) does not flag up this issue. Please can you ask the applicant to clarify whether there would be a net loss of this High Distinctiveness habitat? If so, why is this and what options has the applicant considered in order to replace this habitat?”

I hope that the following discussion provides adequate clarification on the points raised.

The Ecological Appraisal describes the habitats in accordance with Phase 1 Habitat Survey methodology, and so it makes reference to marshy grassland, dry ditch and wet ditch. Within Phase 1 categorisation, there is no habitat category entitled “Coastal Floodplain Grazing Marsh” (CFGF), and so the habitat is described, and discussed, as a mixture of marshy grassland and wet/dry ditches, which is how the habitat appears within the site.

Within the section of the Ecological Appraisal which presents the Biodiversity Net Gain Assessment, using the DEFRA Metric 3.0, the habitat categorisation follows the UKHab methodology, as stipulated by the Metric. Within this UKHab categorisation, Grassland –

Floodplain Wetland Mosaic (CFGM) is used to describe and categorise the habitat (marshy grassland with ditches). The change in habitat reference is a reflection of the change between using Phase 1 categories and UKHab categories.

One other element to note is that the Multi-agency Geographic Information for the Countryside (MAGIC) website shows the entire eastern sector of the site (between the central ditch and the River Thames) as being CFGM. On the ground, in reality, this is not the case for all of this area, as some of it is not marshy grassland (it is semi-improved grassland, and not marshy) and some of it has been used for agriculture (arable). In addition, the MAGIC website itself states that the 'confidence in the main habitat classification' is low. It goes on to state that the sources of data are the Environment Agency's Flood Zone 3 maps and aerial photograph from 2009. I would assume, in this case, that no ground-truthing of the CFGM classification on the MAGIC maps has been undertaken and that our Ecological Appraisal (2021) presents the most up-to-date assessment of the habitats that are actually present within the site.

The proposals are expected to result in a +21.68% net gain in habitat units and a +71.21% net gain in hedgerow units. However, according to the DEFRA Metric 3.0, there will be a loss of Floodplain Wetland Mosaic (CFGM) units as a result of the proposals. The proposals will result in the loss of 1.95ha of CFGM, with 0.56ha retained and enhanced, and 2.19ha created. This is a net increase of 0.24ha.

Furthermore, the condition of the existing CFGM is given as fairly poor, whilst all retained and newly created CFGM will be high condition. Therefore, the reason for a net loss in CFGM units is due to the difficulty and temporal risk multipliers applied to new habitat creation.

In this instance, we consider that there is a high chance of success for habitat creation and establishment through management, which the Metric doesn't take into account. CFGM is a habitat that is primarily dependant on the hydrological conditions, and management regime of a locality. New areas of CFGM are to be created where existing CFGM already sits and within Environment Agency Flood Zone 3, a hydrologically suitable location for such habitat creation. Furthermore, the management regime (including improved water management) will be targeted to achieve a high condition habitat, whereas at present there is no ecological management regime. In that regard it is important to note that the implementation of a habitat/ecological management scheme can be secured through planning controls upon the grant of planning permission, which is a potential benefit of permitting the development. By contrast the existing habitats are in a relatively poor condition and are somewhat vulnerable to arable farming practices that are not under the control of the Local Planning Authority. We are therefore of the opinion that the restoration scheme is capable of delivering a net increase in CFGM units, which is a benefit of the development that is not accurately displayed by the Metric due to generalisations in its calculation.

An additional benefit for CFGM as part of the proposed scheme, again not taken into account by the Metric, is the cumulative benefit of the habitat mosaic proposed. The CFGM will be situated within a mosaic of neutral grassland, hedgerows and reedbed. The interplay of these habitats will provide a much greater ecological benefit than the existing situation, and an ecological benefit much greater than the component parts. This interplay is not taken into account by the Metric, however it has been taken into account in the design of the proposals, and our ecological assessment, hence the inclusion of an apparent net-loss in CFGM units.

Considering the above, we believe that CFGM will be expanded and significantly enhanced within the site as a result of the proposals. This is in part due to factors which the Metric doesn't take into account and/or generalises. This is considered a suitable explanation for the apparent net-loss in CFGM units.

Some additional notes:

The CFGM values are now updated to include the southern retention area. See Calculation 9 (Metric in Excel spreadsheet).

The areas are:

- Original 2.51
- Enhanced 0.56
- Created 2.19

The CFGM in the east of the site, including the area that is former arable is 'low' confidence for classification in MAGIC.

I hope that this provides the necessary clarification, as requested.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'E. Bodsworth', with a long horizontal flourish extending to the right.

Edward Bodsworth MA (Cantab) PhD MCIEEM
DIRECTOR



