

# Planning Application Response

## Ecology

**To:** Mary Hudson  
**From:** Haidrun Breith, Landscape Officer, Oxfordshire County Council sent on behalf of Ecology  
**Site:** Land at White Cross Farm, Wallingford, Oxfordshire  
**Detail:** Notice of Submission of Further Information in relation to Application for Planning Permission Accompanied by an Environmental Statement  
**Reference:** MW.0115/21  
**Date sent:** 15<sup>th</sup> August 2022

**Recommendation: Further information required.**

### Further Ecological Comments

The following comments have been provided by Matt Wall, Principle Ecological Consultant at Wharton in lieu of the County Ecologist, who is currently on leave.

My thoughts below are based on the information I have been provided as well as that on the portal.

Following revisions to the scheme the applicant has satisfied the trading rules within the biodiversity metric in relation to habitats and hedgerows. The revisions to the metric indicate that sufficient floodplain wetland mosaic (CFGM) is being created to satisfy the trading rules within the metric and that a net gain in habitats can be achieved. The measures required to achieve the conditions stated within the metric can be secured through condition for a habitat management plan.

I welcome the clarification that the applicant has provided in relation to the delay in habitat creation as a result of the phased nature of the scheme.

I do however still require further information in relation to the river condition assessment as requested in the planning application response dated 27<sup>th</sup> June 2022. The letter sent in response to this request from Greenfield Enviro, dated 22<sup>nd</sup> July 2022, states *"We feel it is unjustified to specifically address river units in the metric calculations as there are no proposals for any development/operations within a 30m corridor from the riverbank"*, however they then go on to state that *"it is proposed, following completion of operations, to enhance the 30m corridor with the establishment and management of neutral grassland which contributes positively to the overall biodiversity net gain"*.

Whilst I welcome the principle of enhancing this area of land which will not be subject to development, to ensure that a measurable enhancement is delivered, the baseline and enhancement information needs to be provided within the river tabs of the metric.

The rationale for this is that MoRPh surveys (Modular River Survey – used to assess river condition in the DEFRA metric) must extend from the river to 10m from the bank top on both banks and record information relating to the bank tops and bank faces. On this basis it is justifiable to request that this information be gathered and entered into the metric to ensure a transparent assessment in accordance with Biodiversity Net Gain Good Practice Principles for Development (CIEEM, CIRIA, IEMA, 2016), and to enable us to fully understand the impact (positive or negative) of the scheme on the river condition.