

Rebekah Morgan, Senior Planning Officer
Cherwell District Council
Bodicote House, Bodicote
Banbury
Oxon
OX15 4AA

June 4th 2020

Ref : 19/02708/OUT Bicester Heritage Provide new employment units comprising B1 (Business), B2 (General Industrial), B8 (Storage) and D1 (Education) uses with ancillary offices, storage, display and sales, with all matters reserved except for access

Dear Ms Morgan,

The Oxfordshire Branch of the Campaign to Protect Rural England (CPRE) promotes the beauty, tranquillity and diversity of rural Oxfordshire by encouraging the sustainable use of land and other natural resources in town and country.

CPRE wish to strongly object to this application for the reason that it does not comply with the requirements of the Local Plan or national policy regarding ecology and biodiversity gain.

The application site is within Bicester Airfield LWS. Page 17 of the LVIA states that, "Ecology Solutions will prepare a comprehensive Ecology Strategy for the development which will involve full consultation with the CDC ecology adviser". There is no evidence of an ecology strategy or that a consultation has taken place. The ecology officer has not apparently commented to date.

The application fails to give any information on ecological surveys which might have been performed although the LWS has a range of protected and notable species. The report of Dr Alison Smith of the Environmental Change Institute, previously submitted to you (listed under Public Comments on 20/2/2020 as '9 Church St, accompanying document'), refers to the importance of areas of very rare calcareous grassland in the Bicester Airfield LWS. The TVERC map in her report shows that such grassland is present in this application site. There is no information to show how any important ecology is to be protected or its destruction mitigated.

Page 27 of the design and access statement states that, "Proposals may offer long-term enhancements for biodiversity" but no enhancements or mitigation measures are given as required by council policy or paragraph 15 of the NPPF. Local Plan Policy Bicester 8 states, "The biodiversity of the site should be protected and enhanced and habitats and species surveys (including a Great Crested Newt survey) should be undertaken". Also LP para B287 requires that, "In addition to identifying biodiversity impacts, biodiversity surveys and reports should identify opportunities to deliver biodiversity enhancements". No such survey data has been presented in the application documents. What mitigation measures are being undertaken?

It is now council policy (Executive Committee October 7th, 2019) to ask each development to achieve a 10% net gain in biodiversity. This application has not demonstrated any attempt to achieve a net gain and does not provide a landscape and ecology management plan.

Yours sincerely,
Pamela Roberts
Dr PJ Roberts, Vice-Chair Cherwell District CPRE

Copies to: Sir David Gilmore, Chairman Cherwell District CPRE
Helen Marshall, CPRE Director