

Bernadette Owens, Senior Planning Officer
Cherwell District Council
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5 October 2020

Dear Ms Owens

Ref : 20/02469/SCOP Scoping Opinion – Environmental Impact Assessment of the allocated Gavray Drive site in Bicester

Outlined below is CPRE Oxfordshire comments in response to Planning Reference 20/02469/SCOP Environmental Impact Assessment (EIA) allocated Gavray Drive site in Bicester.

We were surprised that the Ecology Section (5) in the EIA did not contain reference to the Upper Ray Conservation Target Area which includes a local wildlife site within its area. We strongly believe that this should be included within EIA scope as some of the proposed development appears to be fall within the Conservation Target Area (CTA) boundary, but its wet meadowland ecology is now rarely found in the UK. The environmental impact on any development on the CTA must be measured.

It is a requirement of the Government's National Planning Policy Framework (NPPF) para 170 that proposed developments should provide "net gains for biodiversity". The approach of CTAs, which is supported by all of the districts in Oxfordshire, is recognised in the Government's Strategy for England's Wildlife and Eco System, which sets out their ambition to halt the loss of England's biodiversity. This is further reflected in Cherwell Local Plan Policy ESD 11 which states that "development which would prevent the aims of a CTA being achieved will not be permitted". The CTA on Gavray Meadows links up with the Wretchwick Green develop thus enabling the widest possible corridor for wildlife to enter and leave the site. It should be noted that developers on Wretchwick Green have pulled back from development on the CTA adjacent to Gavray Meadows.

The CPRE are also concerned that the development will inevitably lead to a rise in noise, light and dust pollution both during and post the construction phase and these elements should be brought into the scope of the EIA. The Council should assure itself that new developments are not contributing to noise pollution in line with the NPPF para 170. Previous site planning applications indicated a prolonged period of lorry movements. Significant materials will need to be transported on to site to enable the raising the land out of the flood plain. Given the absence of a buffer between the edge of the development and the CTA, it is highly likely that noise and light will inevitably impact on the delicate ecological balance within the CTA post construction.

The species section of the EIA (section 5) lists what are described as important ecological features (IEF). It is not clear from the EIA what is covered by this. The Rare Devil's – Bit

Scabious plant grows on Gavray Meadows and is the sole food of the endangered Marsh Fritillary Butterfly. There have been unconfirmed sightings in the past of the butterfly on Gavray Meadows. As the Marsh Fritillary Butterfly is a conservation priority, we believe it should be recognised as an IEF and considered within the scope of the EIA.

The CPRE supports the Save Gavray Meadows Campaign's suggestion that density of the housing of the west of the Brook should be increased as opposed to development of the CTA. This is a pragmatic solution protecting the borders of the CTA and meeting a key strategic development (13 Gavray Drive) in the Cherwell District Local Plan.

The CPRE believes that the council should hold the line with regard to developing within a CTA so precedents are not set. There is a considerable amount of construction taking place in Bicester which is pushing nature further to the margins. Bicester has garden town status and there is incongruity between a vision of connecting people and nature and allowing development on a CTA sites whose specific purpose is to protect nature

Yours sincerely,

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N Dolden
CPRE, Cherwell District

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