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working locally and nationally to protect and enhance a beautiful, thriving countryside for everyone to value and enjoy

18 December 2020

Dear Ms Ford

## Ref : 20/03254/SCOP Scoping Report – Environmental Impact Assessment of the Bicester Eco Town Exemplar Site Banbury Road Bicester

Outlined below are CPRE Oxfordshire's comments in response to Planning Reference 20/03254/SCOP, Environmental Impact Assessment (EIA) of the Bicester Eco Town Exemplar Site, Banbury Road, Bicester.

CPRE notes that fauna and habitat are scoped in and these should include a botanical survey. The proposed site contains supportive habitat such as grassland, hedgerows, a watercourse and woods that are either within, or adjacent to the site boundary, which could support a range of species. We would expect to see surveys undertaken for important ecological features (IEFs), for example endangered farmland birds and venerable trees. Whilst the site is mainly grassland with a dried pond, this can be excellent for reptiles and invertebrates. Surveys should provide effective mitigation measures as well as a biological impact assessment.

The development should note the requirements contained in Cherwell District Local Plan Policy ESD10, Protection and Enhancement of Biodiversity and the Natural Environment. Attention is drawn to para B237 which states that "developments around Bicester will require surveys carried out for the brown hairstreak butterfly". This also stresses the need for surveys to include the contribution that developments make to wildlife corridors.

It is a requirement of the Government's National Planning Policy Framework (NPPF) para 170 that proposed developments should provide "net gains for biodiversity" and this is further confirmed as a policy requirement in policy ESD10. The biodiversity impact of the proposed development should be undertaken using a recognised metric tool; the Department for Environment, Food and Rural Affairs (DEFRA) have a biodiversity calculator which is widely used. Policy Bicester 1 (North West Eco-Town) in the Cherwell District Local Plan, requires both preservation and enhancement of habitats and species on site, including management and creation of new habitats, with the aim of producing a net gain in biodiversity,

One of the enabling requirements of Bicester Eco Town is that 40% of the site should be open green space across the whole of the eco town development. CPRE are surprised that there is no mention of the impacts of this in the EIA. One of the requirements of Policy Bicester 1 is that the proposed 40% green space should be well - managed and linked to the open countryside.

One of the key objectives of Policy Bicester 1 is to produce a zero – carbon development. A key component is a reduction in journeys by private vehicle and in particular that travel from the development should be by means other than private car, in line with the Eco towns Planning Policy Statement 1. Our understanding is that the EIA states that traffic flows for the development would be modelled using a base year of 2012. CPRE question whether flows could be modelled using a more current period and whether data is available from the first phase of the Eco Town, providing insights into the pattern of current private journeys.

CPRE believes that more specific detail is needed into the impact of the proposed development on the site's biodiversity both during the construction and operational phases. Whilst the objective of 40% green space within the overall Eco Town is laudable, there is a lack of clarity as to the extent that the proposed exemplar town development will contribute towards this objective.

Yours sincerely,

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