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Campaigning to protect our rural county

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By email

June 6th 2021

Re: Screening application 21/01374/SO and outline application 21/01224/OUT for development of land at former RAF Bicester, now Bicester Motion, Bicester OX26 5HA

Dear Mrs Morgan,

CPRE **objects** to both the LPA's screening decision not requesting an EIA and to the outline application to construct an 'automotive experience quarter' on the Bicester airfield for the reasons outlined below:

Challenge to scoping decision 21/01374/SO.

Our letter of May 10th 2021 challenged the LPA's scoping opinion that the proposals are unlikely to have significant environmental effects and that the LPA have not requested an EIA. The LPA defines the development as an 'industrial estate development project' and does not refer to the environmentally sensitive nature of the site in terms of its historical importance or that the site is a designated Local Wildlife Site (Site Code 52X10) containing a habitat which the council has a statutory duty to protect.

The promoters of the site have ignored the fact that the unique historical value of the airfield, as reported by Historic England, is not only its listed buildings but as or more importantly, the open grass flying field both inside and outside the peritrack. Areas of the grass aerodrome comprise calcareous grassland which carries statutory obligations under the NERC Act section 40-41 and is very rare in this part of Oxfordshire. Calcareous grassland is a priority habitat for restoration as part of the two National Character Areas around Bicester: Upper Thames Clay Vale and Cotswolds. CPRE previously alerted the LPA to the special value of the calcareous grassland on the airfield in objection letters against two previous applications to build on the airfield grassland outside the peritrack (the hotel and the F.A.S.T. development). The report from Alison Smith of the Environmental



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Change Institute confirming the airfield ecology from TVERC data was submitted to the LPA in both communications but was ignored.

CPRE maintain that it is misleading to class the application site as ‘previously developed land’ (PDL) as its use by the military was specifically as a pristine grass aerodrome without runways, allowing planes to take off and land in any wind direction with the only hard surface being the peritrack. By this example, an upland grouse moor crossed by an access track would meet the definition of PDL. This is clearly absurd.

CPRE notes that the county archaeologist considers that the archaeological importance of the site has not been investigated sufficiently.

We conclude that the promoter’s EIA screening request letter overlooked the importance of the ecological and historical nature of the open grass flying field as well as aspects of the site’s archaeology. We find that the Council has failed in its duty to take into account these factors by not referring to the site designations in the decision letter. To date, CPRE has not received an acknowledgement or a response to our letter of May 10th 2021 which challenged the LPA’s decision. CPRE are taking professional advice on the options for taking this matter further and we would appreciate a response from the Council within several days.

Response to outline application 21/01224/OUT.

Historic importance: Bicester airfield is a very rare example of a large grass aerodrome without a fixed runway where early types of aircraft are able to take off and land into whichever direction was the prevailing wind. Historic England in their responses to the current as well as previous planning applications, recognises the importance of this unique feature as well as the open views across the flying field. The proposed construction of extensive vehicle circuits across the open flying field is incompatible with the preservation of the heritage asset and its historical significance and not in keeping with the historic aspects of the flying field. Historic England considers that the grassland outside the peritrack is an integral part of the open flying field which should also be protected. The sequential construction of buildings outside the peritrack of the airfield such as the previously proposed hotel and F.A.S.T. employment buildings and now the experience quarter, can only reduce the historical and open landscape quality of this site. The applicant’s proposals will compound the damage already enshrined in existing permissions and should be subject to cumulative EIA.



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The applicant's plans mark the path of two fixed runways across the flying field.

Restricting take-off and landing of aircraft to these runways degrades the purpose of the "open flying field" which allows take-off in any wind direction and is recognised as such an important feature in Historic England's report on the site.

Biodiversity: Para C89 of the Local Plan states that a large part of strategic development Bicester 8 – former RAF Bicester is covered by a Local Wildlife Site (LWS) as well as a proposed LWS. The grass of the flying field provides a pristine habitat that has for over 90 years not been treated with herbicides or fertilisers and, along with the areas outside the perimeter track, is now of high ecological and biodiversity value supporting rare and protected species of plants and animals. The proposals for the built structures, the car park and the winding route of the tracks for vehicles across the flying field will reduce the area of this habitat. CPRE considers that the mitigation measures mentioned such as an 'ecology car park' and 'making grassland within the open space of the experience quarter by redistributing soils and substrate from areas lost or impacted by construction' are inherently second-class to *in situ* retention, likely to fail and are not sufficient to guarantee biodiversity net gain as required by the NPPF and the LPA's own policies on this issue.

In addition, the proposals for a 4x4 track on the Stratton Audley Quarry (Elm Farm Quarry) are in contradiction to para C88 of the Local Plan which says that only low-intensity recreation use of the site is appropriate because it is a designated Local Wildlife Site (Site Code 62C01).

Biodiversity calculator: The Warwickshire biodiversity impact calculator is apparently used to derive a figure of 69.6% net biodiversity gain from the proposed mitigation measures. CPRE doubt the robustness of this figure but it cannot be verified without a working copy (Excel file) of the input data and how it was used to derive the resultant net gain. CPRE asked for a copy to be made publicly available in our letter of May 10th and the request is repeated herewith. We ask the LPA and the applicant to note that transparency and the sharing of calculations is one of the industry-standard best practice principles that apply to the use of biodiversity net gain calculations (ref 1, 2). A refusal to supply these calculations to allow independent verification would be a clear failure to abide by industry standards.

In summary CPRE **objects** to the submitted outline proposals which put in danger the survival of the important historical and biodiversity features of the site and thus contravene both LPA and Government policies on these matters.



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Yours Sincerely,

Pamela Roberts

Vice Chair, Cherwell District CPRE

Copies to: David Peckford, Assistant Director Planning and Development, CDC

Andy Bateson, Team Leader, Major Developments, CDC

Helen Marshall, Director CPRE Oxfordshire

Sir David Gilmour, Chair CPRE Cherwell District

References:

1. <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>

² <https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practical-guide-web.pdf>