

Caroline Ford, Senior Planning Officer  
Cherwell District Council  
Bodicote House, Bodicote  
Banbury  
Oxon  
OX15 4AA

2 July 2021

Dear Ms Ford

**Ref : 21/01630/OUT Proposed residential development on land at Home Farm North West Bicester**

CPRE has reviewed the outline planning application for the North West Bicester Site. Concerns exist around assumptions that have been made with regards to future travel by private car and arrangements to preserve future biodiversity on site.

One of the key objectives of Policy Bicester 1 (North West Bicester Eco Town) is that journeys undertaken by private car should be reduced. In our response to the Scoping Report we specifically queried the use of using an old base year for the modelling of traffic flows. A number of the public objections, that have been received for this development, centred around potential congestion and the modelling used in the Environmental Impact Assessment (EIA) Main supermarkets and shopping outlets (i.e. Bicester Village and Bicester Retail Park) are some distance away. All of these developments favour car use over other transport modes, each with substantial car parks. The recently approved Great Wolf Resort has parking spaces for 900 cars. Neither Bicester Retail Park nor the supermarkets have designated bus stops on site and bus services currently run intermittently. Given the present layout of these amenities, it is difficult for buses to match the convenience of the private car and recently produced data from the RAC indicates that travel by private car is cheaper than each of the alternative public transport modes.

In our response to the Scoping Report, CPRE requested that data should be made available on the pattern of private car journeys undertaken within the current Elmsbrook Development. As an exemplar site, CPRE would expect this data to have been collected and therefore should be included as part of this planning application in order to inform future travel projections and their impact on the road layout within the site. CPRE were disappointed that there were no data on emissions or private journeys within the consultation document and would hope that this data is included in the final planning application.

CPRE welcomes the preservation of existing trees and hedgerows on site which will play an important part in the retention of existing species that are known to be habitants of the site. Bicester has witnessed a steady erosion of much of its green buffer in recent years. As the surveys have identified, this site supports a wide array of species from rare brown hairstreak butterflies to a broad range of birds.

The proposed development as it stands will result in a significant loss of semi improved grassland to hardstanding. This grassland habitat can be excellent for reptiles and invertebrates. Whilst it is acknowledged that new habitat will develop over time, this will take time to formulate and there is no guarantee of successful establishment of new habitat on site. Key to this will be a robust Local Environmental Management Plan (LEMP). It is not clear at this stage who will pay and be responsible for the LEMP. CPRE believes that there is a significant difference in expertise required to maintain a general recreational site as opposed to one that is richer in biodiversity.

CPRE would expect to see a fully completed biodiversity net gain assessment in accordance with the National Planning Policy Framework (NPPF) paras 170 and 175. This should be able to demonstrate that the development will achieve a future 10% gain in biodiversity in line with Cherwell District Council requirements. This should be undertaken using a recognised assessment tool with calculations and working assumptions, fully and transparently shared with the consultees thus allowing plenty of time for analysis.

CPRE welcomes sight of the mitigation measures contained within the EIA statement. We have some queries around the mitigations for downstream adverse impacts of any accidental leaks of contaminants into the Bure Park Nature Reserve. Suggested mitigation is that mixing areas for water and concrete should be at least 10 metres from ditches and watercourses. CPRE queries whether a longer distance away from watercourses could be considered.

Whilst CPRE recognises the suggested mitigation measures for the protection of habitat sites during replanting, CPRE suggest that there is mitigation against the risk of incursion from non - residents. There have been two recent unauthorised incursions of travellers on the Burnehyll Community Woodland and Gavray Meadow sites.

CPRE would also question the completeness of the EIA with regards to the statutory list of designations forming important ecological features within the secondary zone of influence. For example there is no mention of other conservation target areas and local wildlife sites that fall within the zone of influence (Gavray Meadows for example).

In response to the consultation, CPRE raised a concern around the future proofing of the proposed development and whether there was a risk that some of the proposed green space could be traded off to meet potential shortfalls within the proposed infrastructure contained within the current planning application. CPRE mentioned above the potential risk of congestion at the proposed development. In CPRE's response to the developer's consultation document, we mentioned residents' concern over the lack of facilities for certain age groups. An additional potential shortfall has been identified by Sport England regarding provision of green space for healthy lifestyles and food production. CPRE would be expect the current planned levels of green space identified for this development to be protected and not reduced to rectify any potential current or future infrastructure deficiencies.

In summary CPRE believes that clarity is required around how the challenging target of reducing private car usage can be met. CPRE are keen that the final planning application is future proofed, and given the context of the climate emergency, which is more than just reducing carbon emissions, the final planning application should be able to both preserve and enhance the current site's biodiversity.

Yours sincerely,

Nick Dolden



N Dolden  
Cherwell District, CPRE

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