

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

8 August 2021

Dear Mrs Morgan

Ref : 21/02286/F Construction of Coffee Unit with Drive - Thru Facility, North West of Launton Road Roundabout, Skimmingdish Lane, Bicester

CPRE Oxfordshire strongly objects to this planning application.

Cherwell District Council (CDC) set out its approach to responding to the climate change emergency in the CDC Climate Change Framework published in 2020. The recently published report from the Environmental Change Institute, 'Pathways to a Zero Carbon Oxfordshire' indicated that Oxfordshire was likely to achieve a 50% reduction in 2008 emission levels by 2030. However Oxfordshire was falling short in decarbonising transport and encouraging active travel modes such as cycling and walking. CDC's Climate Change Framework has targeted the attainment of net carbon zero emissions in Cherwell by 2030, one of the most challenging timescales for any of the districts in Oxfordshire.

Set within the context of a climate change emergency, CPRE believe that a planning application for a drive thru coffee unit is ill conceived. The principal purpose of a drive thru coffee unit is to provide a service for the convenience of transient vehicle users which will not reduce numbers of vehicle journeys in line with the CDC Climate Change Framework recommendation but actually increase them. Increasing the number of car journeys is also at odds with CDC Local Plan Policy ESD1 which states that a development should seek to reduce the need for travel and National Planning Policy Framework (NPPF) para 124 which states that planning decisions should promote sustainable travel modes that limit future car use.

Approval of this development will send out mixed messages on whether CDC is really serious about meeting the challenge on climate change or whether the CDC Climate Change Framework is another example of greenwashing. The exemplar eco town, which is in the CDC Local Plan, is also being developed in North Bicester and is in fairly close proximity to this development and has a "baked in" target to reduce journeys by car by up to 50%. It is classed as an exemplar site therefore CPRE assumes that CDC would want to model future developments in Bicester on the eco town development.

Bicester Policy 11 in the CDC Local Plan states that developments on employment land at North East Bicester should be 'focussing on maximising access by means other than the private car'. However as the developers have confirmed in their Transport Statement, vehicle movements will increase. Given the relative proximity of the eco town, this facility could be an alternative for eco town residents who might otherwise have accessed town centre cafes.

A significant reduction in car journeys and reductions in vehicle emissions will only be achieved if all future developments in Bicester are planned around active travel modes and not the private car, since the climate change emergency is no respecter of post codes. As part of the healthy new town initiative, Bicester should be at the forefront of promoting active travel alternatives such as cycling and walking. The town has recently invested in a number of new cycle ways in the town and there are three marked out 5km routes for walking and running. The Pathways to a Zero Carbon Oxfordshire report neatly summed up the benefits of active travel; 'a 'shift to local active travel can help increase footfall on local high streets and ease congestion as well as improving health'.

In addition this development, if approved, will cause further damage to the environment and increase vehicle congestion, risk compromising road safety and add to air, light and noise pollution. Given the nature of the development, unless vehicles have stop-start technology, air quality will be further compromised by vehicle idling and queuing for the drive thru facility. As per NPPF para 105, developments that limit the need to travel can help 'reduce congestion and emissions and improve air quality and public health'. The CDC Local Plan ESD10 states that air quality assessments should be undertaken where developments generate an increase in air pollution but an assessment does not appear to have been included in this application.

A further requirement in the Bicester Local Plan is for non - residential developments to be constructed sustainably as per Policy ESD3. This is evidenced by a BREEAM (Building Research Establishment Environmental Assessment Method) rating of very good. There are no listed caveats to this requirement in the Local Plan therefore CPRE question the developer's assertion in their planning statement, page 26, that it is not feasible to adopt BREEAM for schemes of this nature.

CPRE are concerned with the location of this development which is adjacent to a roundabout and is next to Wyndham Hall Care Home. Until fairly recently, Wyndham Hall looked out on to green fields. This outlook has been replaced by industrial looking warehouses and this development would further degrade the care home setting.

Bicester has undergone a significant level of development in recent years with a commensurate erosion of green spaces. Sites such as this are often dismissed as having little ecological significance by ecologists. However it is clear from responses to this application that the existing site is valued by the residents.

CPRE have scrutinised the biodiversity net gain assessment from the developer. Whilst it demonstrates a gain, this falls short of the 10% required by CDC. Whilst the developer's biodiversity report runs to 40 pages, many of the appendices repeat themselves and the report appears light on detail on the development's enhancement and creation of habitat. There is little detail on how the risks to existing habitat and on - site species will be mitigated during the construction and operating phase. There is also little on how the development will contribute towards a green infrastructure network in Bicester or enhance create or restore wildlife corridors in accordance with Policy Bicester 11. Policy ESD 10, para B. 237 in the CDC Local Plan also requires that all developments should carry out surveys on the brown hairstreak butterfly. This is not in the developer's ecology report, which is surprising given the existence on site of blackthorn known to attract the brown hairstreak butterfly.

CPRE is led to believe that the current site comprises fertile land and was historically an allotment site. Bicester Policy 11 states that an assessment should be made to ascertain whether the site contains the best and most versatile agricultural land in line with NPPF para 174. Therefore a survey should be undertaken to determine the quality of the soil on the current site in line with Bicester Policy 11.

CPRE therefore strongly urge CDC to refuse this application. CDC must honour its commitment to a net zero carbon future and recognise that this development runs counter to its aim of reducing travel by private car. Approval of this development would undermine the vision promoted both by the eco town development as well as the healthy Bicester vision. The town would also lose an additional valuable green space. This development would jeopardise the viability of existing cafes in the town, most of which are in more sustainable locations, and therefore undermine the economic case for this development.

Yours sincerely,

Nick Dolden



N Dolden
CPRE, Cherwell District

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