

Bernadette Owens, Senior Planning Officer
Cherwell District Council
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13 September 2021

Dear Ms Owens

**Ref : 21/02861/SCOP Environmental Impact Assessment Scoping Appraisal
Development of Employment Use South West of Grange Farm Little Chesterton**

Outlined below are CPRE Oxfordshire's comments in response to Planning Reference 21/02861/SCOP Environmental Impact Assessment (EIA) Scoping Appraisal.

CPRE are deeply concerned regarding several aspects of this scoping appraisal. The land is not allocated for industrial development in the Cherwell Local Plan. The proposal is for a major industrial development in open countryside which is largely undeveloped apart from a small development of industrial units already located within the proposed development site. The Environmental Statement (ES) should therefore give a detailed justification for the development of such a large employment site far removed from the towns of Bicester and Banbury where development is focussed as a major policy of the Local Plan (LP). The ES should give a robust justification for this major change to Cherwell District LP. The ES should also answer how these proposals fit in with the emerging Oxfordshire 2050 plan.

Regarding the cumulative effects assessment, the entire context of wider planning developments and proposals in the area should be taken into account. The developer's scoping report omits the proposed expansion of Chesterton sports facilities on Akeman Street which is very close to the proposed development. CPRE are concerned as to the potential cumulative impacts of lighting associated with the proposed development taken together with the increased risk of light pollution emanating from the expanded sports facility. CPRE believes that this lighting should be scoped into the ES.

The ES will need to show how the proposed development would not harm the character and appearance of the area and, in this respect, not conflict with Policies ESD13 and ESD15 of the Cherwell Local Plan (CLP). These policies, amongst other things, seek to ensure that development contributes positively to the character of the area and does not cause an undue visual intrusion into the open countryside. Mitigation for the loss of such a large area of good agricultural land should also be considered.

The Tritax Symmetry Park proposals have the potential to increase traffic movements in Little Chesterton both during the construction and operational phases. CPRE are concerned that existing narrow access roads in to Little Chesterton would not be able to cope with the potential demands arising from construction and future operational traffic movements. Therefore the ES must give a clear lead on how potential environmental impacts will be mitigated.

The development states that the proposed facility will employ up to 1300 people. It is not clear to CPRE on the number of staff parking places that will be provided. The environmental effects of numbers of cars and employees accessing the sites on local roads should be assessed as a large employment site in this location is contrary to active travel since main residential areas are a considerable distance from the proposed site.

CPRE question why the proposed standalone Socio Economic Report is not included within the ES. Although the scoping proposal states that the development will be a new research and development facility, including the production of super conducting magnets for medical devices, it is not clear whether the standalone report will provide an assessment of the availability and proximity of the types of worker that will be required and the impact of this proposal on neighbouring developments.

CPRE agree that landscape and biodiversity should be scoped into the ES. There is a lack of detail on existing habitats on site and the future plans for these. CPRE would expect to see a habitat features plan as part of the ES. The report states that the site includes ancient woodland on or adjacent to the site and eight hedgerows that are classed as important. The developer also acknowledges that the site is close to an impact risk zone identified to an adjacent site of special scientific interest. CPRE would expect the developer to consult with Natural England in this instance.

This development is likely to cover large areas of ground with large buildings, parking and cars therefore it is particularly hard to see how the 10% biodiversity net gain required by Cherwell council can be achieved. It is essential that biodiversity assessments and calculations of loss are given in full in the ES to comply with the industry-standard best practice principles for transparency and sharing of calculations as requested by the Chartered Institute of Ecology and Environmental Management (CIEEM) as well as provide suitable mitigation of losses. This should include ecological enhancements particularly where these are required to achieve the necessary gain in biodiversity. The cumulative impact assessment should include consideration of how the green infrastructure will complement those of nearby developments.

Climate Change is scoped into the developer's ES but it is not clear what target the developer is working to in terms of reducing of greenhouse gas (GHG) emissions and by when. This is particularly important given Cherwell District Council's aim of Cherwell being net zero carbon by 2030. CPRE would expect to see in the ES a commitment to compute emissions from transport of construction materials and embedded in materials during the construction phase. CPRE would expect a calculation of expected GHG emissions over its lifetime to include energy and vehicle movements related to the development.

The ES should explain how Cherwell's ESD policies will be adhered to especially with regards to renewable energy generation and sustainable building methods. Given the intensification of climate change, developments such as this one which will have such a huge impact on the environment should demonstrate BREAAAM 'Excellent' rather than 'Very Good '. The ES should show how the development will contribute to the national requirement for renewable electricity generation by for example installation of solar panels over more than 50% of the roof areas.

Yours sincerely,

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CPRE, Cherwell District

Copies to: Sir David Gilmour, CPRE, Cherwell District

Helen Marshall, CPRE Director