

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

11 November 2021

Dear Ms Ford

**Ref : 21/03177/F Employment Development, Axis J9 Phase 3, Howes Lane, Bicester**

CPRE acknowledges that the above proposed development is on an allocated site within the current Cherwell District Council (CDC) Local Plan. CPRE however has some concerns as to the proposed plan as it is currently constituted which are outlined further below.

An emerging vision from the incumbent Oxfordshire Plan 2050 vision is for Oxfordshire to continue to be an attractive place to live in. However CPRE questions whether this vision will be shared by residents on the adjacent Greenwood Estate if this development proceeds in its current form. For example, a resident's objection letter states that "we moved to Bicester to escape the city only to find we will be living in the shadow of a huge noisy set of buildings". There is a clear message from many of residents that this development will lead to a loss of residential amenity and much valued landscape.

CPRE believes that this development, which includes provision for B8 development and buildings with heights of over 11 metres, will result in overbearing massing and industrialisation inappropriate to adjacent residential properties. CPRE also believe that the proposed development is at odds with Bicester Policy 1 of the adopted Cherwell Local Plan which states that buildings on Howes Lane should be for class B1 use with *limited* B2 and B8 use. Since the development for phases 1 and 2 is *predominantly* warehousing, any further development of this form on Howes Lane would clearly not be limited.

If this land is to be allocated for employment, CPRE would consider class B1 to be more appropriate to a residential area without detriment to its amenity. This would be more in line with existing development towards the northern end of site where buildings are smaller and less overpowering to neighbouring residents. Since the primary aim of this development is to provide employment opportunities for residents of the eco town, in order to reduce the need to travel, this objective is likely to be better fulfilled if a broader range of employment opportunities are provided other than logistic employment, particularly as a surfeit of such opportunities already exist within Bicester and its environs.

CPRE are concerned that the much needed A4095 Strategic Link Road (SLR) infrastructure, which is a major requirement for each of the phases of this development, will not be ready until 2024. This is major concern for residents of adjacent properties. There has been a considerable uptick of traffic movements along Howes Lane, particularly from heavy good vehicle movements, with the commensurate increase in noise levels, vehicle emissions and pollution and the heightened risks to road safety. This is likely to be exacerbated by the Great

Wolf and Chesterton Sports Ground developments. CPRE share resident concerns regarding the uptick of vehicle movements and the further negative impacts of this development and others and the impact this has on residential amenity. CPRE are concerned that the further expansion of development and the negative impacts this is having on the environment have not been adequately addressed in the developer's Environmental Statement (ES).

All developments are not only required to demonstrate a net gain in biodiversity, but in Cherwell the required gain is 10%. The biodiversity net gain (bng) for non linear habitat on this development falls below the required 10%. This gain will take some years to materialise and dependant on a well worked up maintenance regime. The realisation of gain is dependent on the underlying assumptions that have been fed into the bng; a change in any one assumption would yield a different result. The bng from the developer gives little margin of error and CPRE do not have confidence that the developer's long term maintenance programme has the necessary rigour to ensure the required gain. One further point is around the use of an old bng calculator when newer up to date models were available such as DEFRA 2 or 3.

CPRE's other concern on biodiversity is the impact of the development on some local species given the further erosion of their habitat. CPRE questions why appropriate surveys have not been provided in the ES. This is especially important when assessing the impact of the loss of existing habitat which may support lapwings and linnets which are red status birds. The developer states that surveys of the brown hairstreak butterfly were not necessary as the habitat on site does not support this species. This runs counter to policy ESD10 para B237 in the Local Plan which requires developments to provide surveys of the brown hairstreak butterfly with no caveats such as whether habitat exists to support it.

The developer recognises that the development falls short of being able to provide on site mitigation for farmland birds. The developer proposes to make a financial contribution to provide suitable habitat off site; in effect "kicking the can down the road". CPRE would welcome some further details on how and where this would be provided particularly given the on site loss of habitat for red listed birds. One of the contributing causes for the sustainability of bird species is the steady erosion of suitable habitat. Cherwell District Council is committed to nature recovery through its Community Nature Plan and if this plan is to have any substance then the Council should press the developer for details of how and where suitable replacement habitat will be provided for species that will be displaced by this development..

CPRE requested that risk of flooding be scoped into the ES. We note that several of the objection letters raise this as an issue, with levels of incidence of flooding in the adjacent residences to the development, exceeding the threshold for the lowest risk level zone. We note the response from CDC Drainage where a culvert under Howes Lane may be obstructed causing flooding to residential properties. CPRE question whether this issue should have been picked up in earlier phases of this development. In the absence of an estimation of flood risk in the ES, the Planning Committee will need to assure themselves that there is no ongoing flood risk to adjoining residences.

CPRE's are concerned that this development for the assessment year 2025 will be a net contributor to green house gas emissions up to 10,000 CO2 grammes. This is concerning given that this development has favourable sustainable transport options and is part of the eco town strategy whose main stated purpose is to reduce carbon emissions. Furthermore, Cherwell District Council's Carbon Framework has set a target of carbon neutrality by 2030. This will require significant reductions in vehicle use, not the increases indicated by this development. CPRE are concerned that these types of development, which include logistics that are already well provided for in Bicester, are more likely to lead to the importation of staff from outside the immediate area, thus increasing car usage and an increase in emissions. In

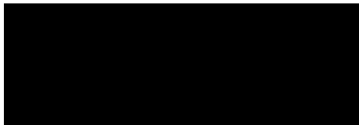
addition, these types of developments require the use of vans and lorries to transport goods which also will drive up emissions.

CPRE welcomes the CDC Climate Change Framework and the Community Nature Recovery Plan and their laudable objectives. However the targets outlined in these plans must be acted on. CDC's ambitious target of net zero carbon by 2030 requires that approved developments must be carbon neutral; the proposed Axis J9 development is likely to fall short in this regard. To enable nature recovery, CDC expects future developments to demonstrate a biodiversity net gain of 10%. The development does not achieve this with regards to non linear habitat.

The approval of this development in its current form will allow a building form inappropriate to adjoining residences and run counter to Bicester Policy 1 which allows only limited warehouse development on Howes Lane. Furthermore there will be environmental risks faced by the same residents around risk of flooding and further traffic on Howes Lane with all of its associated negative impacts on the local environment. Whilst CPRE are not opposed to development on this land which is allocated in the Plan, it believes that a rethink on the development is required to minimise the impacts on residential amenity and the environment and allow CDC to better achieve its stated aims on climate change and nature recovery.

Yours sincerely,

Nick Dolden



N Dolden  
CPRE, Cherwell District

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