

FRITWELL PARISH COUNCIL (FPC)

Reference Planning Application - 21/03267/OUT: Albion Land with two applications proposing development on two parcels of land close to M40 Junction 10. Rebuttal of Albion Land comments

Original Comment	Albion Land Response	Rebuttal
<p>Objection: Fritwell Parish Council strongly objects to these applications for reasons following:</p>	Noted	-
<p>Precedent: Previous refusal of planning application ref:18/00672/OUT (on appeal) noted that the proposal would:</p> <ul style="list-style-type: none"> • “...lead to an urbanisation of the site. This is regardless of whether it is deemed large or small in scale”. • The inspector “consequently disagreed with the LVIA [Landscape Visual Impact Assessment] that the proposal would not have an unacceptable visual impact”. This development is significantly larger and will have higher impact on the vista of the area. • “Whilst the roads and neighbouring petrol station and drive-thru have eroded the landscape quality of the area, the harm would be compounded by the development in an area that otherwise has an open character with open fields of which the site form a part. • The impact of the surrounding development does not weigh in favour of the proposal and does not justify further exacerbation of the harm the proposal would make a significant contribution in urbanising the junction to an unacceptable degree”. • “The proposal would harm the character and appearance of the area ... It would also conflict with 	Albion Land’s applications must be determined on their own merits. The landscape and visual impact; impact on the highway network; various benefits of the proposals and compliance with national and local planning policy are considered in the submission documents	No. The same comments apply to our objection. ANY development on these sites will carry the same detrimental impact to the area as originally observed in conjunction with this prior application. We have only carried forward those comments that continue to prevail, represent our view and are up to date with this Albion Land application.

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<p>saved Policy C8 of the Cherwell Local Plan 1996 which resists sporadic development in open countryside, including developments in the vicinity of the motorway or major road junctions”</p>		
<p>Traffic and Congestion It is noted that an effective traffic survey has not been completed (per reservations from Highways England), considering the scale of this proposal, this seems to an oversight difficult to reconcile with the investment in this application. The class of these warehouses is B8 designated Storage or Distribution, but in targeting employment for 2,840 to 3,840 jobs, clearly this warehousing is targeted for processing for distribution which would significantly increase traffic movements. The M40 Junction 10 / A43 / Baynards Green junctions is a known accident / traffic snarl-up hotspot (source: SABRE), this development can only increase the problems at this junction. The M40/A34/A43 road system "arc" is a well know area for congestion, increasing travel times and resultant pollution, given the massive increase in Bicester of housing and population, the Great Wolf resort planning refusal overturned, this project will only exacerbate an already untenable traffic problem in this vicinity. There are already issues at Junction 9 of the M40 - "Firm admits M40 works at J9 for Bicester made traffic worse" Source: Oxford Mail, 8th April 2019, and at Junction 10 as previously mentioned, often during peak times, negotiating the Baynards Green roundabout can take upwards of 15-20 minutes. Citing "Traffic Congestion to Cost the UK Economy More Than £300 Billion Over the Next 16 Years" Source: Study from INRIX and the Centre for Economics and Business Research Predicts Annual</p>	<p>A transport assessment was prepared and submitted (as part of the Environmental Statement) with each of the planning applications. The Applicant remains in regular dialogue with the local highway authority and National Highways and is currently commissioning further modelling (Bicester Transport Model and VISSIM model). The results of this modelling will be assessed and reported to CDC in due course. The results of this modelling will inform any future mitigation measures to be provided by the development. The number of car parking spaces to be provided has not been determined and will be confirmed at reserved matters stage. The Applicant is proposing a suite of measures to encourage sustainable and active modes of travel to the sites. These include but are not limited to: - Provision of a bus layby, bus infrastructure and financial contributions towards a new or enhanced regular bus service from Bicester that serves both sites - new cycle lanes connecting the Sites to Bicester. These will be secured through a Section 278 agreement and provided within highway land. The cycle lanes will be designed in accordance with the relevant standards and will be sufficiently lit. - Provision of a significant number of secure cycle parking spaces. The final quantum of cycle parking spaces will be determined at reserved matters stage. - Provision</p>	<p>A very woolly response. We await the traffic assessment and will reserve judgement on our view of its viability when it emerges.</p>

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<p>Cost of Congestion in the UK will Rise 63 Percent by 2030 to £21 Billion. LONDON, UK – 14th October 2014. Building such large structures at this junction will only exacerbate already intractable problems and increase traffic pollution in this area, an area that is essentially rural in nature.</p> <p>While this development is close to a motorway junction, there is no public transport to this site. Reference the documents “Environmental Statement: Non-Technical Summary” September 2021. Section 17.4 cites a mitigation measure: “Travel Plan – to encourage sustainable modes of travel by future Site users”, which is clearly not in plan with provision for 1.450 car parking spaces that along with heavy vehicle freight traffic, will exacerbate traffic issues at a very busy junction.</p>	<p>of electric vehicle charging spaces. Ten percent of car parking spaces and ten percent of HGV parking spaces will include active electric charging provision. Fifteen percent of car parking spaces and fifteen percent of HGV spaces will include passive electric charging provision.</p> <p>- Implementation of a Staff Travel Plan – This will include various other measures to promote active and sustainable modes of travel to and from the Site.</p>	
<p>Conversion of Agricultural Land to Industrial use:</p> <p>This land has not been designated in the Local Plan and has been assessed as moderate to good agricultural land, aesthetically, large warehousing would irreparably damage and despoil natural countryside. FPC opines that far too much local green field land has been absorbed in development recently and to remove land from agricultural use when there are many brownfield sites (per CPRE in 2020, 21,000 sites at around 25,000 Hectares) available for development, why not on these sites obviating the need to develop new infrastructure, as would be needed here. FPC opts for the “Do Nothing” scenario preserving the land for agricultural use, this is what farmland is for!</p>	<p>The proposed development will help address a substantial and growing demand for logistics floorspace at a local, regional and national level. The current level of demand is unprecedented and has been exacerbated by the Covid-19 pandemic and Brexit; meanwhile, the availability of logistics floorspace is at a record low. This has resulted in a ‘tipping point’ where demand significantly outweighs supply. It is imperative that planning decisions are cognisant of this urgent requirement for logistics floorspace and the need to facilitate economic recovery at a local, regional and national level. Albion Land’s sites are located immediately adjacent to the strategic highway network (a fundamental requirement of logistics operators) and are ideally placed to address the substantial and growing demand for logistics floorspace. Critically, these sites are available for development now and are capable of accommodating a range of</p>	<p>This is not an adequate response, because it does not address our point. It bemoans the lack of warehousing space in the UK. Albion Land is a “speculative developer” (Quote: “<i>Albion Land’s extensive experience encompasses; bespoke and speculative development in the warehouse, industrial...</i>”, stating as much on the Albion Land website). The “pre-sale” of this facility to DHL only reinforces this. DHL already has a site in Bicester and another in Banbury. The intrinsic value of productive agricultural land far outweighs the value of warehousing which can be sited on any brown field site (of which there are many) or on sites already designated for warehouse development.</p> <p>The development proposed for the 3 sites will undoubtedly affect the local rural villages, landscape, views, and the surrounding farmland.</p>

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	<p>unit sizes (of which there is clear demand for). The submitted Logistics Market Assessment and Land Availability report demonstrates that there are no other sites capable of accommodating development of the nature proposed or that are as well-located to the strategic highway network. Nearly all of the employment sites allocated within the Cherwell Local Plan 2015 have been built out / benefit from planning permission or are not suitable for logistics use of the scale required and proposed</p>	<p>Section 4.2 (Ref. QUOD) states that “The ‘do nothing’ scenario of no development would result in the Site remaining in its existing use, primarily being managed to produce crops.” This is what farmland is for and should be valued for its ecology, health benefits and future sustainability of food supplies. Finally, does DHL <u>really</u> need another site between Bicester and Banbury (M40 Junction 9, 10 and 11)? Culpable for the concreting over of rural farmland?</p>
<p>Pollution: Noise, light and Air pollution are of significant concern during the construction and operation of these warehouses, particularly the cumulative effect that would surround the village of Fritwell with the Heyford development to the Southwest, the potential for the Rail Freight Terminal in the South and this development to the East. Fritwell Parish are deeply concerned about noise attenuation resulting from this facility operating 24/7. Fritwell is Class 3/Class 4 on the Bortle Scale for Night Sky Brightness, this would be compromised by additional light pollution from this planned facility. We enjoy reasonable air quality in Fritwell despite the proximity of the motorway, increased traffic in this area would reduce air quality.</p>	<p>The impact of the proposed development (during construction and operational phases) is considered in the submitted Environmental Statement. The Environmental Impact Assessment concludes that cumulative effects on air quality would not be significant and identifies potential noise mitigation measures that will be implemented to minimise the noise impacts of the development. Lighting will be sensitively designed to minimise impacts within and outside of the site. A suite of measures will be implemented (secured by condition) to minimise the impact of the proposed development on local amenity.</p>	<p>Nonsense. I am sure this is a standard response “cumulative effects on air quality would not be significant” – tell that to children residing in London with lung function problems because of particulates from Diesel engines and road traffic pollution. We do not believe the findings in this analysis.</p>
<p>Flooding: The environment agency may well have identified this area as Flood Zone 1, but local experience in Fritwell indicates that 1. This area has a very high water table with groundworks finding water during dry seasons about 60 cms below the ground in some areas, and; 2. Fritwell experiences annual</p>	<p>The planning application documents include a flood risk assessment, which assesses the impact of the proposed development on flood risk (on-site and offsite). The application documents also set out the sustainable drainage measures to be implemented on both sites. These will ensure that</p>	<p>We remain to be convinced that this development would not affect the area flood risk. What is not mentioned is the long-term maintenance of these “drainage measures” – will this fall to the agents or the leaseholders? We want to know who to hold legally accountable.</p>

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<p>flooding, varying in severity, with 2020 being a particularly bad year with several properties being inundated, 3. Maintenance of an increasingly ageing drainage system is minimal, with the council this year unable to clear gully's because of "budget issues", we are very cynical that this would be sustained over the years of operation.</p> <p>We know that water runoff from a large built area such as this will increase substantially (despite "SUDS"), and even though swales and infiltration basins are suggested, these may work for a while but when "budgets" for maintenance prevent this from happening to retain the efficiency of these measures, we are quite certain that with nowhere else to go, the local villages will suffer.</p>	<p>the development does not increase flood risk. It is important to note that the Environment Agency and Lead Local Flood Risk Authority have not objected to the proposed development. The proposals are therefore acceptable in flood risk terms</p>	
<p>Impact on Biodiversity:</p>		<p>The Quod Non-Technical Summary has been used for our following comments:</p> <p>The plans acknowledge that the development effects on ecology and wildlife on this site would include: ▪ Habitat loss; ▪ Disturbance to wildlife (e.g., from noise/lighting); ▪ Fragmentation of wildlife corridors; and ▪ Disruption to habitats and species. Species present on and in the vicinity of the site include badger, invertebrates, and reptiles (of local ecological importance), farmland birds (of district importance) and foraging bats (of county importance) Residual effects would be on all habitats and species and particularly in relation to birds and bats. Skylarks are a particular feature in this area, regularly seen soaring high above the open fields and farmland. If this development goes ahead, it is important that the bio-diversity offset should be achieved on site or in the local area. 2.9 identifies "Six non-</p>

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		<p>statutory sites are present within 2km of the Site including one Berkshire, Buckinghamshire and Oxfordshire (BBO) Wildlife Trust reserve and five Oxfordshire Local Wildlife Sites (LWS). Stoke Wood LWS is located 0.34km south of the Eastern Site boundary and includes a pocket of ancient woodland and semi natural woodland.”</p> <p>The biodiversity offset proposal on land owned by the Applicant in Piddington is unsuitable for mitigation of a development at Baynard’s Green. The Bio-diversity Net Gain Assessment states that it is unconnected habitat, not in local strategies or part of linked wildlife corridors and not sufficiently local to the site of the bio-diversity loss.</p> <p>If this application is successful, increased biodiversity on the site itself or nearby in the local area needs to be part of the plan. A local nature reserve (or similar) with public access would provide some mitigation for the destructive effects this development will bring to this currently rural area.</p> <p>Local accessible footpaths in the area are well used by villagers but some connectivity has been lost through the building of the M40 and (previously) the Chiltern railway line together with other associated road infrastructure. Any rerouting of footpaths should be aiming to increase the connectivity to the wider footpath network, not simply designed to suit movement within the site.</p> <p>The warehousing and logistics development will be clearly visible from Fritwell Parish bridleway</p>

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		219/11 and other paths 109/1, 109/2 etc. in neighbouring Parishes. Footpaths and bridleways in the area suffer badly from the M40 traffic noise and increased hedgerow screening (or similar) would be advantageous for the use and enjoyment of the area.
<p>Employment and benefit to the community of Fritwell: Fritwell is the largest community closest to this proposed development. FPC, with support from others in the community see only detrimental effects to our village, a rural community established even before the Roman conquest of Britain with a rich heritage. The reduction in amenity and character of the area and the diversion of ancient rights of way are deeply concerning. The jobs offered will likely be largely low skilled and with the number of warehouses already springing up from Bicester to Banbury we are quite sure that thousands of newcomers to the area will be needed, with low to no employment benefits coming to Fritwell, a community of less than 740 with no employment issues. In addition, we are cynical that with warehouse automation being a major trend, we consider these employment projections to be wildly optimistic.</p>	<p>No response to this point. However, the response to the Mid-Cherwell Neighbourhood Forum was:</p> <p><i>“The Proposed Development will create job opportunities for people across a range of different skill-sets, including entry level and low-skilled jobs. The skill profile of residents in Cherwell is more skewed towards lower skilled occupations than the average for the Oxfordshire and the South East. Therefore, the jobs created by the Development are well matched to the district’s skill profile. This is beneficial in the context of wider job growth within the area which is expected to be predominantly in high skilled roles associated with the knowledge based sectors. Providing a higher proportion of lower skilled roles will help to ensure opportunities are available for all of Cherwell’s residents, including entry level positions.”</i></p>	<p>You set out a position without citing any references that support your argument! Unemployment in this area is at 3.1% (spanning across all skill levels- Source: NOMIS: Official Labour Market Statistics for Cherwell), and this catchment area will not sustain the planned employment “opportunities” stemming from this development. This inevitably leads to the conclusion that workers will need to be found elsewhere. This will put concomitant pressure on the locality for increased, high-density housing to accommodate these employees and inevitably transform a rural environment into an urban sprawl, causing irreparable harm to an area of historic significance.</p>