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Oxfordshire

Campaigning to protect our rural county

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Dear Ms Ford

**Ref: 21/03558/OUT – Land north of Gavray Drive, Bicester. Residential development for up to 250 dwellings including affordable housing and ancillary uses including retained Local Wildlife Site, public open space, play areas, localised land remodelling, compensatory flood storage, structural planting and access.**

Housing layout/density. CPRE acknowledges that this greenfield site is allocated for both housing and nature conservation in the LP2031 and accepts that some quantum of development is likely. It is regrettable that farmland will be lost to housing development because CPRE supports the retention of farmland for food production. However, it is clear that the land to the east of Langford brook is of much greater value for wildlife than the western cultivated farmland area. The protection of the local wildlife site (LWS) and the larger Conservation Target Area (CTA) is paramount because these are the most biodiverse green spaces within Bicester's ring road. Although it is CPRE policy to protect farmland, it follows that most of the houses should be located on the western site.

CPRE supports a policy of building at housing densities of greater than 40dph for efficient land use especially when farmland will be lost to built development. Thus the suggestion to build some apartment blocks for smaller households rather than individual houses nearer the western (railway) end of the site is supported.

Housing east of Langford brook along Gavray Drive is more problematical because of the proximity to the designated nature areas. CPRE would support a greater density of housing on the west site in order to further reduce the number of dwellings along Gavray Drive to the east of Langford Brook.

The site identified for housing on the east of Langford brook is constrained by the proximity of the LWS/CTA and the need not to degrade the landscape value of the footpath that runs along the ancient parish boundary hedge. The land being promoted for housing along Gavray Drive is wedge shaped and widens towards the ring road. This provides a wider buffer between the houses and the footpath and LWS/CTA than the housing at the narrow western end of the wedge. CPRE suggest that the housing development area could start somewhat further to the east of the wedge to allow maximum separation from the LWS/CTA.

In order to increase the protection of the LWS/CTA, a buffer of undeveloped land is needed between the houses planned along Gavray Drive and the LWS. Reduction in the pressure on wildlife due to the increased human population living in proximity is important. Factors due to the new housing such as noise, light and household pets will have a detrimental effect on the resident wildlife. The outline plans show that the access



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road for the houses along Gavray Drive will be constructed north of the houses in the buffer zone and the street lighting for that may have a detrimental effect on resident bats that are recorded in the ancient hedgerow.

Flooding in the Langford area has been more severe and the frequency has increased in recent years. We cannot comment on the likely success of the Hydrock drainage schemes and rely on the LLFA to assess this. CPRE are concerned that when the land is raised by the construction of stone platforms to build the new houses on, both west and east of the brook, there will be an increase in the risk of fluvial flooding over the LWS/CTA as the flood water will have a much reduced area to spread out over.

Overall, a decrease in the number of houses on the east site would be preferable for the above reasons.

CPRE acknowledges that Bicester will continue to expand. Table 1 of the Local Plan 2040 Options consultation shows that to date only 25% of the houses destined to be constructed in the town by 2031 have been completed. The Wretchwick Green estate (Bicester 12) has yet to be built and when these 1,500 houses are completed the application site will be surrounded by development. This increases the relative importance of the value of the Local Wildlife Site/CTA to the resident wildlife and to Bicester townspeople as the site is the most biodiverse of Bicester's open spaces. The LWS/CTA has an important function as a wildlife corridor through the expanding urban areas. Plans indicate that the wildlife corridor has been protected through the Wretchwick Green estate.

CPRE appreciates that the developers have respected policy Bicester 13 and will provide funding for a management plan that will ensure the survival of the LWS/CTA as far as possible into the future but this must be settled before the application is determined at committee.

The ownership of the land may change after the application is determined so CPRE supports the strengthening of the protection of the LWS/CTA by it being designated as a Local Green Space in the review of the Local Plan.

CPRE would question some of the assumptions in the local travel plan and sustainability statement around the accessibility of the site and hence the site's ability to limit private car use. Although the submitted travel plan claim that it is long term, it also states that the builder's obligations towards it ends after five years, therefore this committee should be satisfied that the active travel proposals are robust.

CPRE do not accept the developer's contention on page 12 of their sustainability statement that the close proximity of facilities encourages sustainable travel modes that reduce reliance on the private car. With regards to the facilities in Langford, which are within easy walking and cycling distance, the quoted restaurant is in fact a café and the doctor's surgery is set to be replaced by a super surgery, which is further away and less accessible. In addition, whilst the site may be close to the town centre, there are not accessible cycling and walking routes to other facilities such as the Bicester Retail Park and the proposed Great Wolf Resort.

There is little mention of the impacts in the Environmental Statement (ES) of the proposed Bicester London Road Rail Crossing which has been consulted on and a decision is pending. At least two of the options, if selected, will have an environmental



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impact on the development site. One option will close road access to the town from  
Langford Village which will have an impact on road movements within Langford itself.

East West Railway have responded to the consultation elaborating on concept 6 which  
includes a plan to construct a crossing off Gavray Drive. East West Railway admit that  
the amount of land required for the crossing may impact on the numbers of residential  
units that can be constructed given the current configurations. CPRE seek assurances  
that the selection of concept 6 will not impact on the LWS/CTA.

As this development is in the Local Plan, CPRE recognise that there will be some  
development. However this should not be within the LWS/CTA and this has been  
recognised by the developer. CPRE also recognise that the developer has worked  
closely with the local community to deliver a solution for future maintenance  
arrangements of the LWS/CTA. CPRE do however have some concerns with the  
developer's application with regards to the risk of flooding as it impacts on the LWS/CTA.  
CPRE also questions whether the ES, that accompanies the application, has adequately  
addressed the environmental risks of the closure of the Bicester London Road Rail  
Crossing and the potential impact that these will have on this development.

Yours sincerely,

Nick Dolden



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CPRE, Cherwell District

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