

Comment for planning application 21/04275/OUT

Application Number	<input type="text" value="21/04275/OUT"/>
Location	<input type="text" value="Part OS Parcel 8149 Adj Lords Lane And SE Of Hawkwell Farm Lords Lane Bicester"/>
Proposal	<input type="text" value="OUTLINE - with all matters reserved except for Access - Mixed Use Development of up to 3,100 dwellings (including extra care); residential and care accommodation(C2); mixed use local centre (comprising commercial, business and service uses, residential uses, C2 uses, local community uses (F2(a) and F2(b)), hot food takeaways, public house, wine bar); employment area (B2, B8, E(g)); learning and non-residential institutions (Class F1) including primary school (plus land to allow extension of existing Gagle Brook primary school); green Infrastructure including formal (including playing fields) and informal open space, allotments, landscape, biodiversity and amenity space; burial ground; play space (including Neaps/Leaps/MUGA); changing facilities; ground mounted photovoltaic arrays; sustainable drainage systems; movement network comprising new highway, cycle and pedestrian routes and access from highway network; car parking; infrastructure (including utilities); engineering works (including ground modelling); demolition"/>
Case Officer	<input type="text" value="Caroline Ford"/>
Organisation Name	<input type="text" value=""/>
Address	<input type="text" value="33 Bicester Road,,Bucknell,,Oxfordshire"/>
Type of Comment	<input type="text" value="Objection"/>
Type	<input type="text" value="neighbour"/>
Comments	<input type="text" value="I strongly object to the ill-thought through and poorly considered plans for an estate on Hawkwell. I have attached a document with full submissions on why this proposal should be rejected, pulling together some of the two hundred objections set out already and the comments of a number of organisations and also the limited responses received to date from the developers"/>
Received Date	<input type="text" value="19/03/2022 14:19:35"/>
Attachments	The following files have been uploaded: <ul style="list-style-type: none">• Summary of Objections to Planning Application for Hawkwell Village March 2022 (Final).pdf

Why the Proposed Hawkwell “Village” Development should be opposed

Application: 21/04275/OUT

Background

1. On the 11th January 2022 notice was given to a few selected properties in Bucknell village (4/5ths of properties received no notification) and a few selected properties in North-West Bicester (vast swathes of Bicester directly or indirectly affected by the planning application received absolutely no notification at all and have had limited opportunity for their voices to be heard).
2. That application proposes the development of 3,100 houses and a number of further commercial premises, various roads, and a solar array on what is presently a mixture of open arable farm land and cattle grazing land situated North-West of Bicester, across the Lords Lane / Bicester ring road / A4095 from Bure Park, spreading to the boundaries of Bucknell village in the north, Caversfield in the East and abutting the Elmsbrook development and is misleadingly called by the developers- ‘Hawkwell Village’: <https://planningregister.cherwell.gov.uk/Planning/Display/21/04275/OUT>
3. Over the weeks since this application was notified to a limited number of people, slowly others affected by the wide-ranging effects of this devastating plan have become aware of the proposals and hundreds of households in Bicester and the surrounding communities have taken the time to set out how the destruction of the Countryside involved in this proposal, the effect of traffic, noise, pollution and collapse of Bicester infrastructure will affect them. However, due to the limited publicity and notification this development has received, many thousands of those affected by this project are still unaware of its far reaching implications on them and their communities and have been deprived of their opportunity to allow their views to be heard.

Summary of key points

- The present application goes beyond the boundary envisaged by the Cherwell Plan for NW Bicester by some 1/3rd more land

- The Application brings the development to the very boundary of Bucknell village, leading to swallowing up of a local historic village and a large number of protected houses and buildings
- It increases the number of houses it seeks to build from 2,600 (based on the original plan and previous planning application to a whopping 3,100 households and additional premises
- The entire plan is based on a re-aligned Howes Lane, paid for by Oxfordshire County Council and completed by the time of anticipated building in 2023– The finance to undertake this work has since been withdrawn and it is clear it will not be delivered either at all, or before 2030.
- There is no plan in place or roads infrastructure to be able to cope with the vast increase in traffic around the A4095, Bucknell Road, B4100, A4421 or the Banbury and Buckingham roads into Bicester and the plans such as they are in will cause traffic gridlock across Bicester and the surrounding villages
- The developers have failed to carry out any proper modelling on any of the key topics to actually assess what the impact of their plans will be on roads, utilities, schools etc and instead rely upon generalised statistics and outdated work of others for projects of a different size and shape
- The NHS have responded indicating that the medical provision within Bicester can not cope and would not be able to cope for many years to come with such a vast increase in people
- The schools envisaged by the Cherwell Plan to cope with the population increase brought by any NW Bicester development have not been built and this development provides no Secondary or Tertiary school places and insufficient primary level schooling
- The plan is based on the concept of sustainable transport serving the new estate, with increased emphasis on Bike travel and Buses. The bus proposals have been criticised by Stagecoach as being unworkable and not financially viable in the long term, the cycle provisions are limited and fail to deal with the need for upgrade to and building of cycle routes away from this estate and into Bicester and the developments distance from key areas, means that only the most dedicated endurance athletes would be tempted to commute, shop and socialise via walking

- The plans only have three main entrances into the estate and the developers have given no thought to how they would prevent vast percentages of the traffic from the site dispersing northwards through the villages of Bucknell and Ardley and onto the proposed new Junction 10 and 10a at Ardley (in order to avoid the tailbacks at Junction 9)
- The plans are criticised by Highway England for using out of date data and failing to carry out any proper modelling as to the effect of this new estate and taking account of all the other mass of development which has occurred or been granted permission to occur in and around the area
- The plan is criticised by Oxfordshire County Council for failing to carry out proper flood modelling or to have plans to overcome the lack of a re-aligned Howes Lane
- Even the land targeted in NW Bicester by the original Cherwell Plan, is based on 2013 and out of date assumptions (contained in a 2014 plan) when the world and area has changed beyond recognition from when those plans were formed and the destruction of large tracks of Countryside and Farms is not now seen by the world as an “Eco” option
- The plan will lead to the conurbation of Bucknell village as part of and connected to Bicester (with insufficient buffer between town and village)

Introduction

4. Objection is taken to this ill-conceived, ill-planned and ill-thought through scheme, termed by the developers “Hawkwell Village”, but which in reality is as far removed from a ‘village’ as is possible to imagine and like much of the application is dressed up purposefully to deceive the reader, the local politicians and the planning committee into believing that the vast development on a green field site is some kind of benefit to the wider population, when it is little more than a thinly veiled attempt at creating a blob of urban sprawl with the sole aim of maximising the profits of the developers behind the plan, whilst systematically attempting to ride rough shod over proper planning, environmental and local impact considerations and stifling any form of proper informed investigation and consultation into its impact.

5. As an example, at a recent meeting with the developers¹ it was suggested by them that the process of concreting over the Countryside, destroying trees, hedges, fields and animal habitats would actually provide a 10% net benefit to the ecology of the area.
6. On further examination it turned out that this bold statement was based on a tortured assessment by the developers, whereby the present land, hedge rows and trees were given a notional value and if it was farm land and natural habitats it was given very limited initial value, which is then bettered by the developers by nominally keeping some of the hedgerows on their plans and surrounding them by brick and concrete structures, thereby destroying them as animal habitat, but which in the developers view meet the requirement to ‘notionally’ improve the ecology by keeping a notional hedge – no longer surrounded by fields, but isolated by being surrounded by humans and concrete! – but having the benefit that on a mathematical equation it can be promoted that the development produces some sort of Ecological benefit, when it clearly doesn’t.
7. Elsewhere, the developers simply fail to undertake any proper modelling of their plans and instead simply concoct the fantasy that the number of journeys carried out by car must have fallen by 15% since 2019, allowing them to rely upon basic modelling carried out by others for a different project back in 2014.
8. Bicester Town Council, the Parish Councils and the planning committee should be under no illusions from the many thousands of words and colourful pretty graphics and pictures deployed in the developer’s planning application; that this scheme, is based largely on smoke and mirrors and does not stand up to even the most basic closer examination and if granted planning permission, would lead to the destruction of wildlife, fields, villages and a way of life in North Oxfordshire, which has survived many hundreds of years, through wars, recessions, and many changes in local and national politics, but would finally be sacrificed to the greed and self-interest of property development, for the sake of property development and seemingly based on a flawed ‘consultation’ process which if allowed to stand, would support a planning application by stealth, seemingly enacted by developers attempting to carry out a substantial further land grab for profit, as they expand their plans well beyond that

¹ The developers (with a team of 9) undertook a ‘presentation’ of their plans to the Bucknell Parish Council on the 14th March 2022, when the developers refused to deal with a number of the questions raised.

originally envisaged in the “Adopted Cherwell Local Plan 2011-2031 (Part 1)” and has been conducted by attempting to stifle proper consultation and investigation into the effect of the plans and stifling any proper debate of the impact of such wide ranging plans.

9. For Bicester the plans are potentially devastating, as many of those objecting have pointed out from their own personal experiences on the ground, living, schooling and working in and around Bicester, the infrastructure in the North-West Bicester area is simply not in place to be able to take such a vast estate and if the development is allowed, the roads would become gridlocked, the Schools would be swamped with little or no extra educational provision, the health provision would be unable to cope, the Water and Sewage provisions are unable to cope and for those living down stream from the water, foul waste and surface water run-off, in Bure Park, Southwold, Northfields and beyond the effect would be potentially catastrophic.

Lack of proper notice and/or consultation

10. Sadly, the notice procedure adopted by the developers for this proposed development and supposed “consultation” was deliberately woeful and does not comply with either planning law or indeed any form of open justice, but instead seemingly reflects an underlying theme of this application of attempting to force these plans through ‘under the radar’ without any proper form of careful consideration of the impact of such vast development or any proper “consultation” of those impacted by it, at all.
11. The only notice that has been provided to the many thousands of households effected by these plans, was for a select few houses in Bucknell and a select few houses within the road immediately abutting the site in Bicester to be provided with a notice letter. Upon what criteria these specific addresses were chosen or why other addresses and people were excluded is totally unclear, but the provision of notes to only a small proportion of people effected, coupled with the odd small A4 notice on a field effected is simply improper and inadequate in both law and also simple principles of fairness.
12. The vast majority of Bucknell itself, almost all of Bicester and none of the outlying effected villages and communities, such as Ardley (directly effected by the traffic from

the project travelling up to Junction 10), Caversfield (effected directly by abutting the project and the roads effected), Middleton Stoney (effected by traffic routes), Elmsbrook abutting and planned to have a connecting road into it, or large swathes of Bicester (including nearly all of Bure Park, all of Southwold, all of Northfields and the Bucknell road), directly affected by either overlooking or abutting the proposed site, or effected directly by the vast increase in traffic (in particular those living off the Bucknell Road down through the Highfields estate or those living in and off the A4095 in both directions) have not been notified of this application OR given any opportunity to comment or be involved in what the developers claim was a “consultation”.

13. In relation to the supposed “consultation” provided by the developers:

At Para 5.2 of the developers ‘Health Impact Assessment’ document it is claimed by the developer that:

“The proposals for Hawkwell Village have **been part of a long running engagement process including a wide section of the community**”.

14. However, neither prior to the planning application being served on the last working day before Christmas 2021 nor since has there in fact been any “consultation” or even engagement with any community effected by this development or any group or local Council or representative of those living in a) Bucknell b) Ardley c) North-West Bicester, including: i) Elmsbrook ii) those living around Howes Lane iii) those abutting the Bucknell Road in Bicester iv) Bure Park estate v) the Southwold estate OR the directly affected communities of Caversfield, Chesterton, Ardley or Middleton Stoney.
15. The developers claim that they held a “pre-application consultation” via a ‘virtual’ consultation held on the <https://www.hawkwellvillage.com/>. In fact, investigation shows that this site and supposed ‘consultation’ lasted from only the 22nd October 2021 to the 12th November 2021.
16. It is not clear how the developers consider 3 weeks on a web site (and some posters in the Bicester library) to constitute “long running engagement” or covering “a wide section of the community”

17. However, in order to participate in this ‘consultation’ the people would have to know it existed. When further investigation occurs, it appears that its existence was advertised on a small noticeboard in Bicester library. The fact that no one knew of this site / consultation is demonstrated by another of the developers claims. The developers claim that this virtual consultation had a “140” visits during its lifetime. Although, the developers have since refused to answer how many of those very limited ‘hits’ on their consultation site were in fact related to either the sites developers and/or the developers themselves or their agents. It is submitted that it is highly likely that the vast majority of those very small number of hits for a website were in fact created by the developers themselves visiting their own site.
18. But to put the developers figures of “140” in some sort of context, the www.stophawkwell.com/ website, which has had no vast finances behind it, has managed in excess of **1811** hits in the first few weeks of its existence, with a single message on the development on social media attracting 50 to 500 comments/messages.
19. The developers have to date also refused to answer how many independent contributors there were to any consultation and what if any changes the developers undertook as a result of any person or groups observations.
20. These issues become extremely pertinent when anyone considers the repeated theme of many of the objections raised by professional bodies, from Thames Water, the Police, the NHS, The National Highways Agency, to Oxfordshire County Council, all of whom have set out that despite efforts by them to engage with the developers, at the time of the plans being submitted the developers had simply refused to engage with them.
21. With a proposed development of this vast size, it would have been proper and indeed proportionate to have all affected addresses in all affected areas directly notified and advertisements undertaken advertising the plan and directing people to local meetings, where the proposals could have been properly set out and questions and answers about the detail of the development provided.
22. Indeed, it would be common and proportionate on a proposed development of this size to have undertaken proper 3D modelling and detailed models of the proposed site, so all

those potentially effected can be aware and of the extent of the proposals and make an informed decision and input to the consultation process. This has instead been deliberately lacking in the present application (although they appeared at a recent presentation, so clearly existed), Instead the planning application is made up of thousands of words and key phrases and vague concepts and even vaguer outline maps / plans describing concepts but lacking any real detail of the proposals or any proper investigation into its impact.

23. To have not notified ALL properties within these areas and in particular Bicester and Bucknell, means there can be no proper consultation process at all. Only a very small number of people directly or indirectly effected by these plans appear to have ever been provided notice of it at all, which given the proposed size and impact of this development is simply not lawful nor followed any of the concepts of open and proper consultation which underpin planning Law. It is difficult to know how anyone could object to something that they are totally unaware exists, or perhaps that was the aim?
24. In short the application is full of key phrases and words, which it is no doubt hoped will impress a planning committee or the surrounding population, but lacking in any proper detail or modelling which could allow any proper informed consultation of the people or proper consideration by a planning committee of the details of this proposal and/or its impact.
25. Until such defects as there are in the application itself, the application process, and consultation process, are properly remedied then the Application should be opposed by all those with a responsibility to represent those whose communities it affects.

The need for development of the size proposed?

26. At present Bicester and the surrounding area is in the midst of a large number of different large building projects, including Elmsbrook, Graven Hill, the completion of Kingsmere, and in the wider area the development of Upper Heyford and many others. These projects in combination have and are delivering many thousands of houses, yet there has been no pause to consider the impact that these projects are already having on the area, the economy of the area, the standard of living, the housing needs and

infrastructure and utilities OR importantly any consideration of what they are likely to have on the infrastructure of Bicester and the surrounding area, now that a number of these developments are operating, nor their effect on the housing market and housing stock.

27. Indeed, since the original Cherwell Plan in 2014 where the concept of certain land being identified for potential development occurred, the whole of Bicester and the wider area has changed beyond recognition. The World has changed, Brexit, Pandemic and Environmental treaties, including COP26 and war have followed in the intervening period and the importance of :
 1. Farmland and the environment and the need to have self-sufficient farmland to become less reliant on importation and transportation of cereal, milk and other food products has taken on a premium
 2. We have learnt the importance of the Countryside and open green spaces on the mental health of citizens and
 3. The environmental impact of concreting over fields, trees and hedges which provide oxygen and devour the carbon dioxide produced and provide habitats for all animals has started to be appreciated and understood.

28. It is frankly madness to suggest that a community has to be forced to be wed to a plan formed nearly a decade ago (and presented in 2014) when so many other developments have occurred and unforeseen events have hit locally, such as the vast swathes of brownfield site at MOD Bicester becoming available, when it was thought during the 2014 plan that such land would never be freed up by the MOD or developments such as ‘Great Wolf’ or Ardley Rail Freight, expansion of Bicester Village and surrounding area were not foreseeable OR nationally and world-wide, without first pausing and assessing the impact on the infrastructure of the present developments which have been completed, those in the building process and those granted permission.

29. Basic checks on open-source material shows that there are hundreds of these properties on new estates which remain unsold in the Bicester area and remain unsold for long periods, which indicates that there is simply not the market for many thousands more houses built to a very similar specification to the mass which are already on the market.

Neither this present proposal and planning application nor those already under development avoid suffering from the same fundamental problem, as none deals with the level or type of housing which is actually required (first time/social), nor does it deal with where precisely it is needed, nor does it actually have any real plans for work creation or business/industry use, save for uncontrollable provision of warehousing around Bicester, which provides very low density employment, low skilled and low valued employment, which in turn could not afford the planned homes which estates such as the present aim to build and the ones which maximise the profits for the developers the most (those with value from around £300,000 to £500,000).

30. The fundamental basis for any proposed development of this scale is whether there is firstly a recognised need for the size and type of development that is proposed and for it to be needed in the place where it is proposed it should be developed. Unfortunately, that is a need that can only be assessed properly on a unique 'development by development' basis and at the time when the development is applied for, not relying purely on housing needs for a whole County, carried out years before.
31. The size, style and position of the proposed development is simply not now justified or justifiable. The wider planning needs and concepts encapsulated in the Oxfordshire plan, envisaged mixed use of developments, with employment and business being provided locally to support jobs for those in the housing, alongside the provision of social space, shops, education and medical provision. None of that is catered for in the present application nor seemingly any consideration given to the impact of simply 'dumping' 3,100 households on the edge of an all ready heavily developed old Market Town, which has aging infrastructure and has lost many of its amenities, from the failing of the High Street, to the closure of the local Magistrates Court.

Employment

32. In order to meet the Developer's concept that traffic levels created by this development should be assessed as 15% lower than even those assessed in 2019, it would be necessary for vast swathes of the population of the proposed estate to be employed within the estate itself.

33. Indeed, the Cherwell Plan for North-West Bicester envisaged:

“At least 3,000 jobs (approximately 1,000 jobs on B use class land on the site) within the plan period”

34. It is not clear from the developers plans how on earth this development could create 3,000 meaningful jobs or even a small fraction of those needs. Indeed, not even half that figure in what are termed ‘low-value jobs’ could even be achieved on a plan that provides for such extremely limited land for employment (i.e. only 0.7ha reserved for the ‘employment area’). The developers at the recent meeting, seemed to be unaware of the Cherwell Plans figures for employment creation at all, let alone addressed how they were to deliver it.
35. But the jobs created by any development in North-West Bicester would need to be of higher value jobs in order for those employed in such businesses and industry to be able to afford the houses within the estate and for it therefore to become self-sufficient enough to discourage travel, a concept upon which the whole presently flawed plan is based.
36. In other words, the developers may well create the job of a take-away delivery driver, from the undoubted ubiquitous takeaway outlet in the ‘local centre’ they will provide OR even the warehouse worker in the habitual Bicester Warehouse they would build, but such jobs, let alone 3,000 even if there limited development could come close to producing them, would not in turn be able to afford the average house price that is the target of this and similar developments.
37. The developers are devoid of any firm plans (or indeed any plan at all) and have even devoted insufficient land to attain even a small proportion of the high value jobs which would be required to meet their generalised concept of people living and working on or close to the estate.
38. It is, as with much of the plans, pie in the sky to simply think that if you provide a small parcel of land within a housing estate that jobs will magically be created. Jobs

unfortunately for generations of politicians, don't suddenly get produced and as matter of fact, the development of areas where high skilled / high value jobs are created, are inconsistent with areas of domestic housing and hence across the Country specialist and dedicated industrial estates, business parks or innovation centres are built, there is however not one example across the Country of the provision of high skilled / high value employment in the numbers envisaged and required to stop people travelling / commuting from this estate, having occurred on a small patch of otherwise domestic housing, as the developers have set aside.

39. The application and the developers simply have no plan and no idea as to how it could attract such industry and business to this estate, let alone maintain such employment and instead simply relies on throw away phrases and concepts.

The Population of this estate

40. The constant provision of vast warehouses around Bicester, as presently appears to be the development plan, does not provide much if any real long-term employment and certainly for the space consumed, are very poor providers of job creation or self-sufficiency. Which in turn means that every single one of the new proposed 3100 households (or approximately **7,440 people** – using purely average UK household size data, but approx. **13,600** based on size of properties in development and the average children in the socio-economic group which the application is aimed at), will all have to have employment out of the area, they will in short have to commute to work.
41. Due to the lack of superstores and proper shopping, it will in turn be a necessity for all of the proposed households to commute, to work, to the nearest shops in Bicester and even education, which in turn causes further strain on the now inadequate transport infrastructure of North Oxfordshire and in particular around NW Bicester.
42. Somewhat incredibly, the developers have simply not undertaken (or published) a realistic model even of how many people are likely to be housed in the proposed 3,100 dwellings. They haven't addressed the average family size of the socio-economic group that the development is aimed at and seem to be unable to accurately assess whether the population of North-West Bicester will therefore increase by **7,440** or **13,600** people or

somewhere in between, a matter which is a fairly fundamental starting point before the developers or anyone else could ever hope to understand the likely full impact of this development on the infrastructure and Countryside.

Education

43. The provision of education, schools, play areas, countryside for the Children of this project has simply not been thought through or properly assessed and the present proposals run contrary to the ethos of the Oxfordshire Local plan and that of the Adopted Cherwell Local Plan.
44. Of those 3100 properties proposed, some 7,440 of the occupants (based on national average for socio-economic group the development is aimed at of 2.4 children per household) will be Children. Simply having a pre-existing “Gagle Brook Primary School” (capacity 210), which was forced to be adopted as part of the Elmsbrook planning application, will do nothing to be able to cater for the primary, secondary and then tertiary needs of the thousands of children who will be housed in the present vast extensions to Bicester (including the already permitted extension to the area directly around the school), let alone the introduction of in excess of 7,000 more children in this proposal.
45. The Cherwell Plan for North West Bicester itself envisaged the need for at least:

“Up to **four primary schools** and **one secondary school**”;
46. Of those objectives, there is the single primary school at Gagglebrook and within the Developers plan, they have generalised space for another infant school around what is colloquially called the “local centre”, but in the reality of all the other developments around Bicester will consist of a Co-Op, a Fish and Chip shop and either a Chinese or Pizza takeaway. That primary school site abuts directly the Bucknell / Bicester country lane and will in turn add to the traffic output via Bucknell and other villages.
47. However, even if the developers achieved that it would amount to only half the minimum requirement envisaged for primary education and meets none of the

requirements for the more expensive secondary and tertiary education and in reality, is many hundreds of students short of being able to provide for the infant children of an estate aimed at young professional families.

48. Sadly, not only is the infant School provision wholly inadequate and poorly thought out and situated, but in addition, there is absolutely no provision for any secondary school. Seemingly that is passed on as a responsibility by this developer to the development called “Himley Village”. However, Himley village itself is stalled with promises by developers that simply have not (and will not) materialise and homes that cannot themselves be built until the infrastructure of a new Howes Lane re-alignment is met. Meaning without homes and all the other infrastructure, no School will be built into the foreseeable future at “Himley Village” and if this development were granted permission before Himley could be developed, these developers would have neatly side-stepped the provision of any secondary education.
49. In relation to sixth form or tertiary education, seemingly that is ignored in its entirety and there will be no provision for the mass of sixth form places that such a development would produce.

Water / Waste Provision

50. Thames Water have responded to the developer’s plans. They set out that as well as the plans repeatedly breaching limits upon building in close proximity to Water mains pipes throughout the planned development (which will at the very least require the present plans to be amended). It has become apparent that in relation to the provision of ‘potable’ or drinking water in the area of NW Bicester and this proposed development, Thames Water has the capacity to be able to provide for a maximum of a further “49” houses only (not 3,100). In relation to foul water removal, Thames Water has the capacity to service “0” (zero) further houses in the area.
51. Thames Water have indicated in their response that:

*“Following initial investigations, Thames Water **has identified an inability of the existing Foul water network infrastructure to accommodate the needs of this development proposal**”*

52. It is further clear that no investigation and / or modelling reports have been undertaken by the developers to assess what effect a further 3,100 properties and additional businesses (for example the oils and fat deposited into old sewage systems downstream) will have on the historical problems that Bucknell has had with flooding and sewage blockages. Generally caused by foul water backing up within the system and inadequate drainage. The present water reports has seemingly undertaken no work on the flow of waste water and sewage from Bucknell nor modelled the effect on the network on the communities downstream in Bure Park, Southwold and Bicester Town Centre, but simply worked on the assumption that another company (Thames Water) will have to somehow provide sufficient infrastructure work to provide for this development.

53. Thames Water suggest that permission be refused unless:

“1. All foul water network upgrades required to accommodate the additional flows from the development have been completed”

54. In relation to the water network, Thames Water have replied:

*“Following initial investigations, Thames Water **has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal**. Thames Water have contacted the developer in an attempt to agree a position on water networks **but have been unable to do so**”*

55. In addition, Thames Water identify that there are a number of Water Mains running through the proposed development and within the 5 meters of proposed constructions.

56. Although, the developers undoubtedly depend on the fact that a utility company such as Thames Water has a statutory duty to provide for any new development which is

granted permission, that overlooks the fact that building of infrastructure, such as new reservoirs to serve the area, vast pipes and new treatment plants will have a massive impact on Bicester and the whole surrounding area. It can't sensibly be the Council's policy to simply grant planning permission for any number of houses that it chooses, wherever it chooses and hope for the best that the water and effluent treatment will at some point be capable of being provided without effecting thousands of additional people in the areas where they are built.

57. 65% of Thames Water's water provision comes from rivers and 35% from reservoirs, with the present property developments presently being built around Bicester there is simply no additional capacity in this area unless rivers are completely dried out by extraction or large new reservoirs are approved (and which are opposed by the population around them).
58. But water runs downhill and as Bicester and in particular Bure Park and the town centre, stand between this proposed development and the sewage treatment plant at Graven Hill, any increase in sewage and waste water from the thousands of extra humans on this site will lead to repeated effluent discharge in the creaking infrastructure in Bure Park, Southwold and the Town Centre and any blockages that vast numbers of further people create, will lead to those houses and businesses in the town centre being flooded with effluent and waste water.
59. This would have become obvious if waste-water modelling for an estate of 3,100 and where it was to travel to and its effects on Bicester, had been carried out by the developers in conjunction with Thames Water. But as Thames Water in their response make clear, they have had no engagement from the developers prior to them submitting their plans. For a proposal of this size, that is an extraordinary failure and sums up the approach of this developer to simply attempt to force through their proposal and then rely on the local council and statutorily obliged bodies in every field to themselves finance and investigate ways of implementing their building site, whilst they collect the profits of their plan.

60. But the point in relation to infrastructure, work, schooling, transport, water, is that no one has allowed the mass of construction of the last decade in and around Bicester and the subsequent vast expansion of Bicester itself, to actually bed down and to be able to assess properly the future impact and whether the infrastructure can actually cope with what is being developed presently before considering introducing another vast swathe of housing, with totally unknown consequences and potentially unforeseen consequences.

Land Grab - Expansion of this development

61. The developers have deployed within their application a land grab that even President Putin himself would have been proud of.
62. Hidden away within their literature and maps provided alongside this application, it becomes clear that the developers have sought to go considerably beyond the site limits which had previously been indicated in the Cherwell Local Plan, developed after many years of consultation.
63. Although it is not clear or expressly stated in any of the literature provided by the developers the extent of land which is over that provided for in the Cherwell Local Plan (and they have to date refused to quantify the additional land grab), the 'land grab' of this development appears to lead to a suggested increase in the area for development by approximately **30%** from the originally approved area for development envisaged and consulted on for the Cherwell Local Plan and incorporated within the Oxfordshire Plan.
64. This is frankly and simply disproportionate, wrong in principle and seems to lack any planning law justification or housing need requirement and is simply the worse examples of Planning creep and extension of planning by stealth
65. The developers appear to justify this 'land grab' as somehow being for the benefit of the residents of the village of Bucknell (in the same way others justify land grabs as benefiting the citizens in some way). The argument of the developers seems to be the denizens of Bucknell village could then rest assured, they argue, safe in the knowledge

that because they had developed all the land up to the village, no further development of land between their development (Bicester) and the village could then occur in the future. With the greatest of respect, such a justification is utter nonsense. It is no argument to develop land right up to the boundary of the village on the basis that it stops future development on the same land.

66. Indeed, the developers then attempt to sell this “land grab” on the secondary basis that it will allow them to create a buffer zone between their housing estate and Bucknell village and thereby, it is presumed, they are suggesting that they will mitigate some of the damage caused to the village itself.
67. Clearly that is simply an illogical suggestion. The original boundaries covering the extreme limits of any development area, envisaged a maximum development area, not an area which has to be met by a developer or in some way aspired to develop up to the boundaries of, nor one where the developer should or could develop with houses right up to the previous envisaged boundary.
68. Instead, the whole point and emphasis of the Oxfordshire plan and the adopted Cherwell Plan, was that such land which was proposed for development should have within its already defined boundaries, environmental considerations, trees, plants, wildlife areas, ponds and social use areas, such as parks and playing fields and play areas, as well as within the existing envisaged boundary a buffer zone between the development (most obviously and naturally made up of woodland, the wider the more effective) to cut down the environmental impact of sound, light and air pollution. What it doesn't envisage is the grab of further land simply in order for the developers to provide for the various things they are duty bound to provide in a plan and development of this scale.
69. The whole purpose for the developer's approach is clearly and obviously to maximise the number of households it can build and therefore the profits it makes, whilst adding the mitigation features it is duty bound to provide with any such development, in additional land it wishes to grab and destroy.
70. The Cherwell Plan for North West Bicester envisaged that:

“Forty percent green space, half of which will be public open space”

71. In order to maximise their profits, the developers have now increased the proposed number of houses on this site by over 17% from the previous 2,600 (previously agreed for this site) to some 3,100 for this Application, an increase of some 500 dwellings (approximately 2,150 extra people). There is apparently no justification for this increase, except for the company to maximise its profits.
72. However, within the previous prescribed boundaries for this development within the original Cherwell Plan, it would have been impossible for the developers to build 3,100 dwellings and still meet the obligation to deliver: “Forty percent green space, half of which will be public open space” and hence the developers now make a further land grab to expand their development and do so with entirely false attempted justifications of doing it to benefit the village of Bucknell, when in reality it has the completely opposite effect, but the reason they need extra land is to allow them to develop the increased 3,100 and still meet the required 40% green space.
73. Oxfordshire County Council comment:

“This application is for 3100 dwellings plus local centre and other uses on part of land previously brought forward under a 2014 application for 2600 units, ref 14/01384/F.

***This would result in a significant increase in the amount of housing at NW Bicester compared with the policy.** The majority of the site is within the area of Policy Bicester 1 (NW Bicester) **but some of it extends northwest towards Bucknell village, outside the policy area.**”*

74. But the short facts are that this proposed development involves:
 - a) taking 30% more Countryside than that allowed within the Cherwell Plan
 - b) Building 17% more dwellings than was previously planned and
 - c) introducing some 2,150 extra people than that envisaged and through them extra vehicles to a small area of Bicester, which has no infrastructure to cope with any increase, let alone such a big one.

75. Put simply, the size of this vast plan is directly related to a number of the issues raised in this and other objections, the larger the development, the more traffic, the more damage to the local infrastructure. The larger the development the larger the damage to the environment, the larger the development the more impact on the nearby village etc and simply grabbing more land to destroy as part of this development is not an appropriate answer or suggestion.
76. The present plans are defective and considerably too large to be sustainable on any indicator and a considerably more modest development, containing more environmental mitigation and large buffer zone, contained at the very least, within the existing footprint envisaged by the Cherwell plan may well be a plan that could allow for some more sustainable development to occur, but the present plan falls far far short of that.

Transportation

77. As set out above, the present plans lack the required detail or indeed any form of proper coherent modelling as to the likely effect of the vast increase in vehicles on the transport and infrastructure in and around Bicester and the surrounding villages for any proper assessment of the impact of this plan to be concluded by the planning committee and as such granting this planning application would be an act based on hope and optimism and a myriad of false promises, as opposed to hard facts, modelling and science.
78. Indeed, both The National Highways Agency and Oxfordshire County Council transport criticise the Developers lack of up to date modelling and their use of other developers data forecast from 2014, without any consideration of the many other developments which have since been built and / or have been granted planning permission.
79. Both organisations criticise the developers for their lack of consultation before launching this planning application and for the use by the developers of unrealistic assumptions to justify an astonishing claim of downward predicted adjustment of traffic using the site, with this reduction then being applied to old data produced by others, for

a previous and different planning application, and which results in the developers claim that the traffic using this site will be 15% less than statistics used in 2019.

80. Even more extraordinarily, these developers have the benefit of Elmsbrook and Kingsmere being near completion and as a very basic model could have undertaken studies to establish how many vehicles there are per household for those developments, compared to what was previously anticipated/estimated there would be at the planning stage of those developments and to have then calculated what the present road usage around Bicester and the surrounding villages are over a period of a year or so. Quite extraordinarily, given the size and impact of this development, none of that has been done.
81. But by way of basic calculation, on average in the UK there are on average 1.2 cars per household, however, the socio-economic group that this development is clearly aimed at (and indeed the previous developments of Elmsbrook, Kingsmere and Upper Heyford were targeted at) according to the national statistics will be those in the 7th decile group upwards (i.e. the top 30% of those earning in the UK) where the average car ownership is closer to 2 vehicles per household (although fortunately for the developers the average of large vehicles such as caravans or campervans is lower, although still not catered for in these plans). Meaning that this one development alone is likely to contribute at least a further **6,200** cars to the local roads.
82. 6,200 further vehicles on the already creaking A4095 Bicester ring road, the rat run of the Bicester Road up to and through Bucknell to Ardley, Junction 10 and beyond, the B4100 up to Baynards Green and the A43 and the A4421 across to Buckingham and Milton Keynes, Howes Lane across to Junction 9, the Middleton Stoney Road up to the A34 and Oxford and the A41 to Aylesbury and up to and including Junction 9, would mean that these roads, which at peak times are often in complete gridlock, would completely collapse. As many of the residents of Bicester have pointed out, through their objections, from their own personal bitter experience of the present road infrastructure of Bicester.
83. The developers are clearly aware that the devastating and detrimental impact of so many additional cars is unarguable and would be catastrophic on the local infrastructure

and instead attempt to counter this argument and manipulate the figures, rather than undertaking modelling of the impact of past developments and their actual car usage / ownership and model that against the predicted vehicular use of this project, instead the developers in their application blithely claim that few of the proposed household will need to use vehicles, as there will be public transport and cycle routes and the anticipation (as was suggested at a recent meeting) that the citizens of this estate would have few reasons to leave it, due to the claimed full employment / education etc provided [See above].

84. However, the bleak reality of the facts behind this development, is that:

- The occupants will need to commute to work
- The public transport provision simply does not work (see below)
- The 11,000+ occupants will then need to drive to work or at least the station
- They will need to drive to the Schools, Shops and Doctors
- They will have vast numbers of delivery vans supplying them with their internet shopping and orders

85. But none of this has been modelled at all.

86. Such a concept of self-sufficiency, is not only fanciful but has been proved to be wrong on the historical developments in and around Bicester and beyond, where similar promises were made at the planning stage and yet prove to be wrong within months and years of the development being occupied.

87. In addition, as with every other recent project, there is the inbuilt suggestion that vehicle ownership will be discouraged by not providing garages and alike. Which in turn is criticised by the Thames Valley Police (TVP) response as leading to the increased criminality and anti-social behaviour now being widely experienced and reported on the Kingsmere estate, where exactly the same false promises were made by developers at the planning stage and seemingly lapped up by planning committees.

88. Frankly such arguments are utter nonsense in reality. The development will be some considerable distance from the train stations (see below) in the centre of Bicester and 'public transport' in the form of buses from the estate to the train stations, are infrequent, slow and impracticable for any one such as those with a trade to get between non-fixed work areas often with tools and equipment.
89. The plans for buses on this estate run into the historical problems outlined by StageCoach, that the Bure Park estate was not designed with buses in mind and is not and cannot be accommodated by bus routes and as such there is no proper existing route near to the site (unlike Kingsmere and Graven Hill developments) upon which this estate could simply be grafted on to a pre-existing route. Additionally, Stagecoach point out that the design of this estate is not bus friendly and experience of the Elmsbrook estate is showing an extremely poor take up of buses, due to lack of frequency, delays caused by traffic and distance from houses to designated stops. Meaning that the dedicated bus service serving Elmsbrook which is presently propped up by taxpayer's money via Oxfordshire Council subsidies will become unviable and will cease the moment the subsidies are taken away (as they are due to be within the next two years)
90. As a result, what will happen in reality with this estate, will be that the households are forced to have at least two vehicles to transport occupants to work and / or school / shopping / commute. As years go on and those living on these estates change from the original purchasers (who no doubt as initial purchasers have good "eco" intentions), history shows that the new generations of occupiers start to develop the housing to suit their needs and their needs will be to have parking and space for vehicles, caravans and alike (the nation will not suddenly stop using vehicles or caravans) and as such they will tarmac over gardens to form drives, if no parking is provided, they will simply park on pavement and roads, blocking further egress into and out of the estate by buses (as there will be no enforcement on a privately owned estate over time) and /or the occupants will add further garage space in gardens and front rooms.
91. On a practical example, if any of the planning committee or Councillors are in any doubt about car usage in supposed 'eco' estates, then one only has to travel through Elmsbrook (although still in its early stages) and therefore still not in second and third

generation ownership, where the initial ideals of a scheme start to ebb away, or perhaps more accurately Kingsmere and Upper Heyford and slightly older and a better example, the Garden Quarter in Caversfield or Bure Park itself and see the mass of vehicles which travel through them at peak times and originate from them, or look at examples further afield, such as the 'eco' estates in Milton Keynes which were developed with the concept of non- vehicular ownership, but which a decade or so on have proved to be developed on a completely false premise.

92. The reality is that no development can successfully manipulate, let alone force its future occupants to not use their own vehicles. As such this plan has to be considered realistically that it will add in excess of another 6,200 vehicles to the roads of Bicester and North Oxfordshire.

93. Although there has been, it would seem purposefully on the part of the developers, no modelling undertaken to show the planning committee, Counsellors or indeed the public the effect of such vehicular increase on the surrounding roads. The reason of course why such proper modelling is absent, is that the results would be predictably horrifying. I would urge, that if there is any doubt about its impact, for the reader to travel through Bicester and the surrounding area at peak times, to see how the present level of traffic (even with the slow build-up of traffic after a global pandemic) is having or to try and travel past Bicester Village at peak times or access Junction 9 or the M40 or the A34 from Bicester either in the summer months or during the work day rush hour. A couple of examples are below:



Cars illegally parked around Bicester. This is the A41.



Part of a 7 mile traffic jam to get into Bicester Village.

(Courtesy of the Bicester TAG – Source: <https://bicesteritag.jimdofree.com/>)

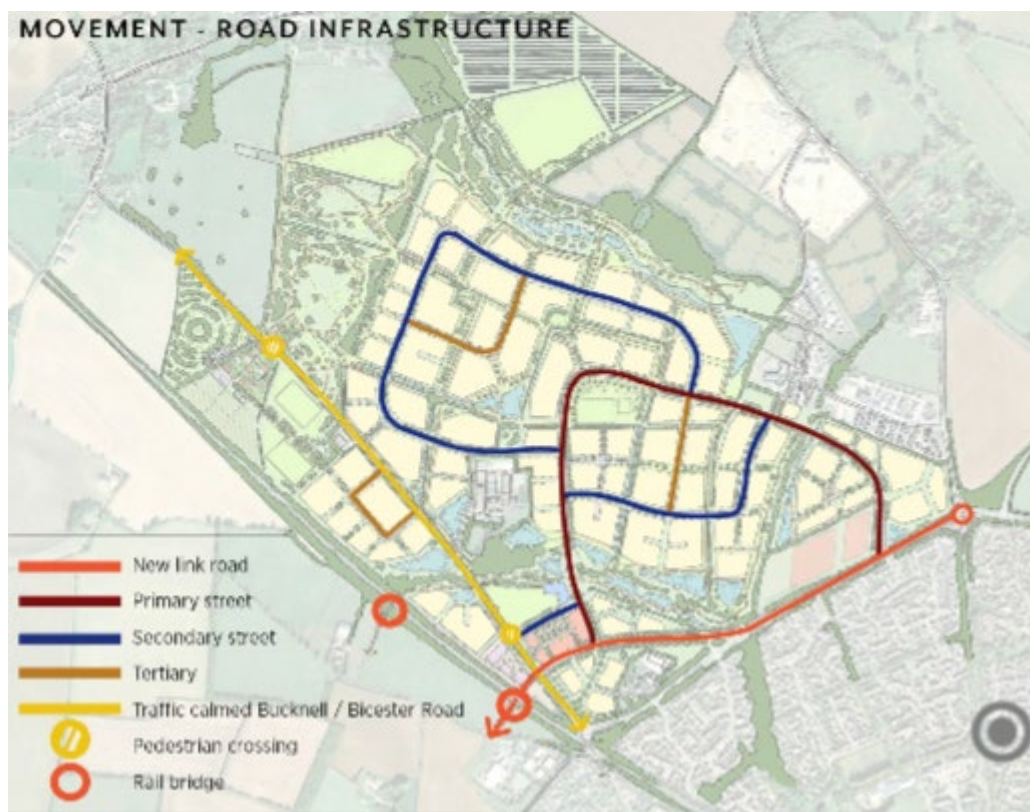


94. During rush hour or weekends when Bicester Village is at its busiest, the centre of Bicester and its access roads (with the traffic calming measures allowing access to only one carriage at a time on the Buckingham and Banbury Roads into Bicester from the North) is gridlocked. It can take 30 minutes to cross from one side of what was a small market town to the other. Junction 9 to the M40, which was envisaged in the Oxfordshire plan and Cherwell local plan as being developed to the extent that it would ease traffic congestion, has in fact had the opposite effect and the queue to get onto the roundabout above Junction 9 will often lead to tailbacks of 10-15 minutes or more during summer and peak times.
95. The present problems and vehicular carnage throughout Bicester is soon to be exacerbated by the coming onto line of further developments to the South of Bicester and the further expansion of Bicester Village, with its overflow car parks as far away as RAF Bicester, in Caversfield, to the north of the town and with developments such as the Great Wolf leisure result on its some 400 extra vehicles travelling around Bicester.

96. The A34 to and from Oxford and fed directly by Bicester traffic is now at a standstill back to Kiddlington junction most mornings and evenings and when, as had happened pre-pandemic at least 6 times a year (and up to 2019 was increasing year on year), the M40 becomes blocked and traffic is funnelled through Bicester (giving a good idea of what an extra 6,000 vehicle movements looks like) the whole of Bicester enters a massive gridlock in all directions as the roads infrastructure simply collapses and stops functioning. Cars attempt to funnel away from the gridlocked main roads into the surrounding estates and with parked cars throughout these, those roads quickly become blocked and nothing is able to move.

The reliance upon a re-aligned Howes' Lane

97. The developers plan's for accommodating the traffic needs of a vast new estate is entirely dependent on a new link Road (Orange below)



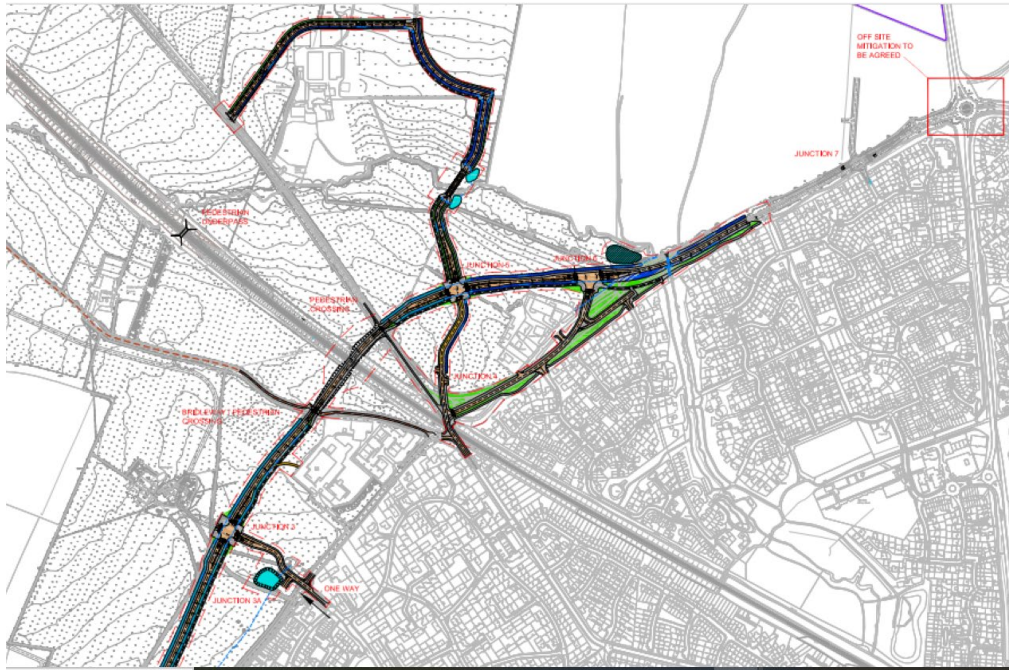
98. At the South-Western end (marked with an orange circle and an arrow), is the Developers proposed re-alignment of Howes' Lane:



Proposed re-alignment
for a “link Road”

99. It is beyond argument that the developers entire transport and therefore building plan is based on the building of the new link road.
100. Indeed, in their planning documentation the developers concede the primary importance of such infrastructure to the development, stating:

“In order to adequately serve the proposed NWB allocation, increase the network capacity and remove any barriers and constraints, a new NW Strategic Link Road, through the realignment of the A4095, was proposed as part of the Vehicle Access Strategy. This scheme is being delivered by Oxfordshire County Council with completion due in 2023”



101. However, as the developers would have been aware when submitting their application based on those proposals, Oxfordshire County Council no longer had funding in place even to carry out the proposed re-alignment of Howes lane, let alone the wider development of the roads suggested in the developers plans and there are no plans in place or in the foreseeable future for this project to be completed.

102. It is clear that the developers have absolutely no contingency plan for roads and transport, when this planned re-development of the roads and infrastructure around the development doesn't go ahead, let alone get completed by 2023 (as claimed in the original planning application).

103. The developers answer to this is to suggest that they be granted planning permission and that they could then build a number of houses up to a pre-determined limit where a new road is required. Quite frankly such a suggestion demonstrates a complete lack of understanding that the present B4095 road junction with Howes Lane, with the present staggered junction under the bridge, is incapable of coping with the present traffic and large service vehicles, let alone any increase.



104. The developers have refused to answer whether they (as the principle beneficiaries of the new road alignment) have sufficient funds in place to pay for the building of a new road linking the South-West of their site to the Middleton Stoney Road and beyond, but clearly how this is to be delivered, is simply not dealt with in their Application.

105. Oxfordshire County Council transport department object to the Project with (amongst others) the following comments:

“It is noted that the application site boundary extends beyond the Local Plan allocation boundary to the north, towards the settlement of Bucknell.

The application **assumes that the Strategic Link Road/A4095 diversion will be in place in 2024 and argues that there is sufficient capacity in the local road network for the development to be occupied before the SLR is open. This point has not yet been established because OCC’s Cabinet has removed the housing and growth deal funding from this scheme, therefore the delivery of the SLR has been paused subject to finding alternative ways of funding, which means that a resultant severe congestion impact could last some years.”**

106. Oxfordshire County Council Objections continue, that they object for the following reasons:

*“The sustainable **travel and parking strategies are not considered strong enough to result in the low external vehicle trip generation predicted in the TA (Transport Assessment).***

Elements of the bus and access strategy are not in accordance with the NW Bicester SPD's Access and Travel Strategy.

*There is **insufficient detail to assess the safety of accesses from the highway, for all users.***

*It is not possible, from the transport assessment provided with the application, **to fully assess the traffic impact of the development**”*

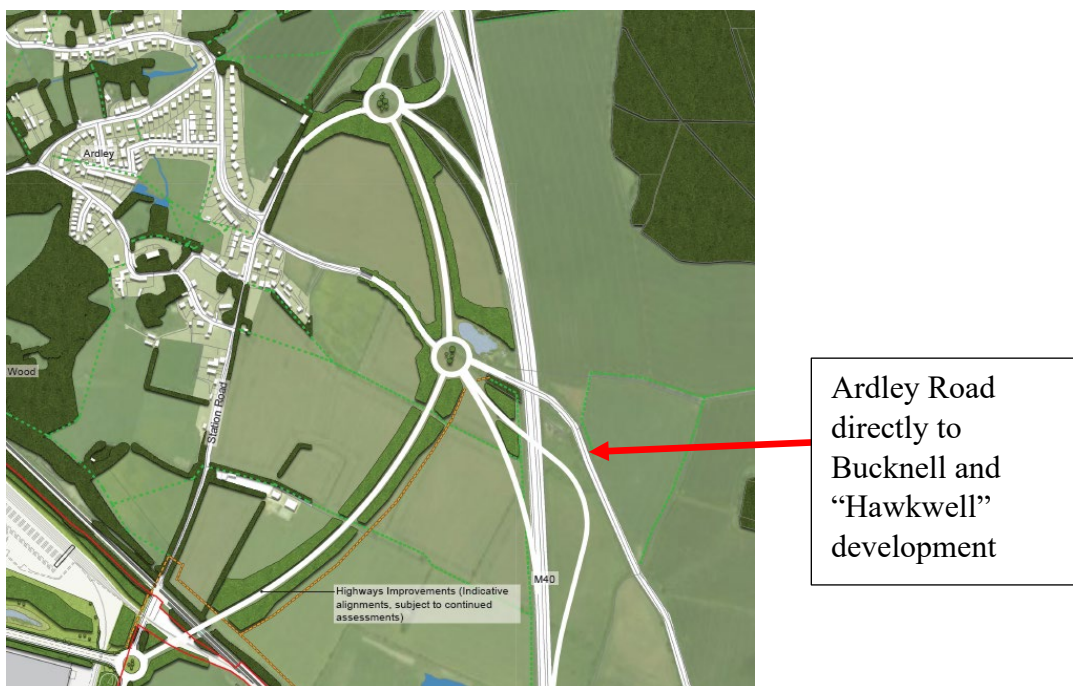
107. Oxfordshire County Council Continue:

*“The access from the realigned section of the A4095 [i.e North of Bure Park]. **It can no longer be assumed that this will be delivered by OCC,** due to a recent change in the funding programme. **The developer would need to deliver the realignment from Lords Lane west to their accesses and the Bucknell Road sustainable travel route.** As part of the access from the existing highway, full details of this road and its junction with Lords Lane will be required. **The connection of this road under the railway and the completion of the realigned part of the A4095 is necessary to distribute traffic from the development,** so there would need to be a restriction on development before this connection is made.”*

108. There is nothing within the proposed plans as to how the developers themselves will be able to deliver themselves the realigned section of the A4095, or the re-aligned Howes' Lane or how they plan to finance it all and without that, the whole plan is critically and fatally flawed and the planning application is based on an entirely false and misleading premise.

109. To make matters worse on the transport front of this application, the developers appear to be blissfully unaware or are choosing to deliberately ignore the impact of other developments planned or granted in the area. For example, the plans totally ignore the proposed rail freight terminal development at Ardley and its effect on traffic to and from the exact same area as this estate is being built.

110. In particular because there has been no modelling of predicted traffic flows and amount, the developers were unable to answer what effect their development would have especially when taken in conjunction with the proposed additional Junction 10 and 10a at Ardley (for the Rail freight terminal) developments, which is planned to directly dissipate its traffic onto the Bucknell/Bicester Road (which out of Bucknell becomes the Ardley Road) and leads via Bucknell and country lanes directly to this proposed development at “Hawkwell Village” and indeed directly onto one of the proposed entry/exit points for the developers estate:



111. Given the lorries and vans which the Ardley Rail interchange will create and the quickest point to the proposed NW Bicester development from the rail freight terminal is via Bucknell village, it is clear and obvious that this Country lane would quickly become swamped with traffic, yet the developers have undertaken no modelling and are completely unable to say with any scientific certainty what the increase in cars, lorries, vans and commercial vehicles will be, if both the Ardley rail/freight terminal and “Hawkwell” got approval.

112. There are seemingly no plans that the developers have to prevent lorries, vans and commercial vehicles using the Ardley, Bucknell, Bicester lane as a short cut from

motorway to the proposed estate Or from Freight terminal to new estate and any re-modelled road.

113. However, in addition, as part of those rail interchange plans, there is to be a Middleton Stoney “relief road” which will directly connect to Bucknell’s “Middleton Road”, a single track lane with few passing points:



114. But seemingly the developers seem unaware of the combined impact of the plans on the roads West of Bicester and certainly have failed to produce any plans or proposals in place to prevent the “Hawkwell” estate development and the ‘relief road’ creating the perfect storm of vehicles using Bucknell and the single track, Middleton Road as a ‘rat run’ to get in and out of Bicester or on and off of the A34 (avoiding Junction 9).

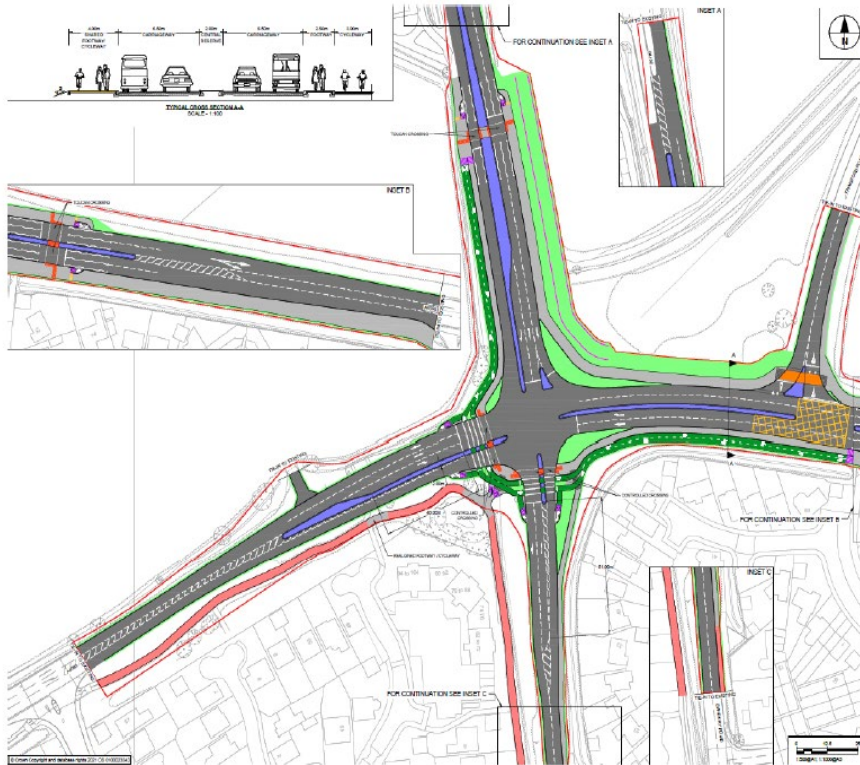
115. Additionally, at present the Thames Valley Roads Policing Unit is based on Howes Lane and uses Bucknell lane/ Bicester Lane for fast access to emergencies on the M40 and beyond. The developers seemed to be unaware of this and have no plans as to how they would access emergencies if the Howes Lane re-alignment ever went ahead and as a result the removal of the Police’s rapid access, which would instead be re-routed into the developers estate and out the otherside, eventually onto the Bicester/Bucknell Road, where the emergency services would then meet the developers plans for enhanced traffic calming measures along a mile long road.

116. Needless to say no modelling or consideration has been given to what the increased response time for emergency services serving the M40 and North West of Bicester would be, given the confines of this proposed scheme.
117. Further, there has been objection to the plans set out by those living on Howes Lane as to the effect that hugely increased traffic has already had on them and their safety, and their fear that construction traffic would use Howes Lane via Vendee Drive (around the Kingsmere estate) to access the site. It is clear that if granted permission the heavy good vehicles and work traffic would blight the roads and area for many residents of Bicester for years to come.

The Planned Junctions to and from the Estate and effect on ring road and Bucknell

118. But in addition, the plans submitted take no account of how the planned estate will interact with the present road infrastructure. There is no detailed or specialised modelling as how the three suggested access points to the estate will interact with the numerous other planned changes and junctions being introduced. It appears in the vague, ill-conceived plans which are provided that it is suggested that there will be light controlled junctions at the main access point onto the A4095 and directly opposite an entrance point onto the Bure Park estate. Such a plan can only have been conceived by developers with no knowledge of the local area or who simply don't care about the impact of their plan on the roads and have simply looked at a map of the area and concluded that a junction at a certain point would fit.
119. The reality is that if a traffic-controlled junction were placed on the Bicester Road or the A4095 ring road (there are none at present), the log jam created would spread back in all directions, blocking the present roundabouts which allow the access of traffic into and out of Bicester.
120. The developers have also failed to take into account, let alone properly modelled the present plans which are in existence for the redevelopment of the roads near to their entrance.

121. Below is the proposal to develop the junction of B4100 (Bicester Road) to Baynards Green and A4095 Junction, with the claimed aim of “The design of the proposed scheme has been undertaken to relieve congestion, accommodate the North West Bicester development and improve cycle and pedestrian link to and from the North West Bicester development and Bicester”



122. Directly to the West of this Junction and only a matter of 50-75meters away, will be the further 4-way, traffic light controlled main entrance to this proposed development and the main road across to a re-aligned Howes Lane and up to Bucknell and beyond.
123. The developers proposed main junction to enter the estate, to the West of the above junction, has been described by Oxfordshire County Council transport response as:

*“7. **The main access onto Lords Lane is not in accordance with the masterplan,** which instead had the spine road continuing into Charlotte Ave, to the B4100.”*

124. Given the vast increase in traffic entering the A4095 only meters to the west of this junction at yet another traffic light controlled junction on the developers proposals, it is somewhat surprising that absolutely no modelling been undertaken to estimate the tail

backs and gridlock which will be created in all directions by having the main arterial ring road stopped by traffic lights at two places in quick succession, including the duel effect of these proposals on traffic traversing around Bicester or trying to enter Bicester.

125. But additionally, what the developers don't seem to have appreciated and factored into these plans, is that the egress and ingress into a site of this size in the circumstances of where it is situated, is unprecedented, for planning in the Bicester area.
126. By way of example, the Elmsbrook development with two entrances onto a B-road out of Bicester is small in terms of development size in comparison to these present proposals and the position means it is not directly disgorging traffic onto the ring road, but onto a B-Road directly out of Bicester. Kingsmere, by contrast has multiple access points on 3 different roads, on three different sides of the project, including one access / ring road, which was specifically and purpose built for the role, to disperse its traffic and another of the access roads used by a number of different entrances, was (at the time) the relatively quiet Middleton Stoney Road into Bicester.
127. Graven Hill is South of Bicester and close to the M40 and is fed by two substantial roads dissipating traffic onto the M40 without having to go north into or around Bicester.
128. In contrast, this proposed estate development is situated in an area already busy with traffic and which is fed by numerous other estates, such as Bure Park. It has two options, either it disgorges its 6,000 plus vehicles directly onto the small country lane that is the Bicester Road, leading from Bucknell to Bicester, such a plan for any access on this road is wholly inappropriate and simply lacks any forethought or planning, it is a small country lane which is incapable of handling the mass of traffic from the site OR alternatively it provides access directly onto the main ring road, which is already packed at peak times and would not be able to cope with further massed traffic or access points being formed and the mass delays and tailbacks caused by traffic lights in close succession.

129. Such an estate will create a mass of vehicles which will (by human nature) seek to find the lines of least resistance to their journeys and with central Bicester blocked at peak times, vehicles will inevitably find their way through the surrounding villages. Taking Bucknell as an example, if an access point is provided to this proposed estate onto the Bucknell / Bicester Lane, cars and vehicles (including delivery vehicles, building, utility, removal vehicles servicing the estate) would be actively encouraged to use the Bicester Road up to Bucknell to dissipate and get around/ away from Junction 9 and Bicester generally. The village simply can not handle the increased traffic that in excess of 6,000 extra vehicle movements a day would bring and would be consumed in vehicles.
130. To give a very vague model of how many extra vehicle movements that would bring through this small village, 6,000 vehicular movements a working day from the proposed estate would lead on average in the workday from 8am to 6pm to around 10 vehicles per minute passing through the village. But vehicles don't travel in even numbers throughout the day, but instead bunch in periods around rush hour in the morning and evening meaning during those periods in excess of **20 vehicular movements** through the village **each minute** (or a car every 3 seconds). Of course, if any form of proper transport modelling had been undertaken by the developers using independent experts in this field, they would have known this.
131. In the absence of any modelling being provided, I would again urge Counsellors and MP's alike to come and visit Bucknell during peak hours. Already the village is blighted by traffic from Bicester. Many occupants of Bicester, including the local Roads Traffic policing unit, have realised that due to the jams in Bicester it is quicker and easier to get onto the M40 via Junction 10 and this is easier if they travel from Bicester via the Country lane to Bucknell and up to the Ardley, thereby creating a rat run.
132. In peak hours hundreds of car movements occur now through this ancient village, few are journeys undertaken by those coming to or from the village itself, but instead by those cutting through. The village simply can not take any more traffic and the traditional lanes with their twists and turns, high hedge rows (although presumably they will be destroyed as part of the development) were formed in a different era, when the

lane was used by horse and cart and are simply not capable of handling an increase in traffic, let alone such a drastically large increase in vehicular movements.

133. Once again, the developers avoid actually examining this issue let alone attempting to estimate the impact of such vastly increased traffic. Instead, they simply and blandly suggest that ‘traffic calming’ measures can be placed along the Bicester-Bucknell Lane in order to ‘dissuade’ traffic from using it. Frankly, such a suggestion is utter nonsense and is insulting to the intelligence of those effected, once again such suggestions are formed by people who have no connection to the local area, let alone any knowledge of the effects of such a vast proposed development and it has no foundation in reality.
134. The reality is that Bucknell already has significant traffic calming measures in place, two restrictions to the two way traffic (i.e. creating a single lane) ingress and egress to the village at either side of the village, and 5 road ‘humps’, although they have the effect of ‘slowing’ slightly the traffic speeds, they have had absolutely no effect on the volume of traffic and never will, all the time that the journey remains considerably quicker and easier than trying to go through the centre of Bicester. Increasingly lorries and large commercial vehicles are directed by their ‘Sat-Navs’ to come through the village to get into and out of Bicester and this will be increased many hundred-fold, when the target address for the Sat-Nav’s algorithm is an address on an estate that is planned to abut Bucknell.
135. But also, the restriction on the carriageway width at the entrance and exit to the village, whilst successful at slowing traffic approaching the village, has the effect of causing long tail backs to enter the village, if the traffic volume were to increase dramatically, as they will with this new development, each traffic gate, will simply act as a pinch points to cause massive tailbacks into and out of the village, thereby causing vast noise intrusion to the many houses in Bucknell which abridge the road and lead up to the entrance / exit gates.
136. Matters are made worse in peak summer, when the customers attending the local public house use the Bucknell – Bicester Lane through the village and all the adjoining lanes as parking areas, causing predictable traffic chaos, however, if you then add the further

ingredient of increased through traffic of many thousands of cars from this development, the village would be brought to a total standstill.

137. In addition, the increased traffic brings dangers to the villages' more vulnerable road users, the children trying to cross what should be a Country Lane, to get across to the play area on the other side of the cross roads, the elderly who regularly use their motor scooters to travel into Bicester and the horse riders who at present daily use the road, along with the mass of cyclist the village and road presently attracts and in the summer months the walkers trying to access the pathways and right of ways down the Bicester-Bucknell road. All would be run off the road by the dramatic increase in traffic that this development would bring.

The present roads in Bucknell:





138. An average summers day in Bucknell brings at least two elderly disability scooter users passing through heading to Bicester, two sets of horse riders, numerous tractors and large farm equipment going to local fields (especially in summer months), tens of cyclists passing through and numerous country lane walkers.
139. The increase in traffic that this development would bring is simply not something which can or would happily or safely mix with those elements and will lead to an increased a large increase in accidents occurring and the subsequent increase in serious accidents leading to death.
140. The Developers at a recent meeting, had expressed no idea as to how practically they would prevent vastly increased traffic using the Bicester / Bucknell lane and instead fell back on the suggestion that traffic calming (i.e speed humps) would suffice and having planned 9 along the road at distances of 90 meters each. When it was pointed out that Speed humps would make it impossible for the hearses to access the industrial size burial ground the developers have planned abutting the village boundaries, their response was that they could instead be “Speed Cushions”, allowing the hearses and emergency vehicles axels to go either side of it, whilst failing to see that in turn this allows every other vehicle to drive full speed with wheels either side of the “cushion” thereby defeating the whole object.
141. What seems to be lost on the developers is that traffic calming measures simply act to slow traffic in very localised areas around the particular measure (whilst accelerating

hard away from it and until the next one), they do not cut down the traffic at all. In order to do that, the road would have to become less attractive to drivers than sitting in 20 minute tail back in Bicester, waiting to get through and onto Junction 9 and if you are creating that type of delay on the village lane of Bucknell this would in turn massively impact on residents trying to come and go from the village.

142. However, the simple fact is that the developers have given no thought to how to prevent traffic increase on the Country lanes around Bicester or on the rat runs created through the estates of Bicester and are simply intent on maximising the profits of their development at the cost of the existing residents of Bicester and the surrounding villages.
143. As the roads in Bicester become worse, so the problem with the Bucknell/Bicester road becomes worse, but if a further 3,000 households are put on the doorstep, then there would be a massive increase in vans, lorries, coaches, and large commercial vehicles trying to use the road which would in turn destroy Bucknell as a village and would have similar effects to the villages that this road feeds, such as Ardley and Middleton Stoney, Weston on the Green and beyond.
144. With increased road usage along this small village lane, brings with it a large increase in litter and environmental damage. Already, there is on a weekly basis rubbish thrown from passing vehicles from Bicester and 'dumped' along the lane, but also a massive environmental risk to the animals which live in the hedge rows and fields along the lane and use the lane as a crossing point between their environments (the fields and hedgerows on either side), to the humans effected by the massive increase in poisonous gasses from the vehicles.
145. The other side to the bland suggestion of further traffic calming measures being put in place to try and negate the extent of the traffic increase, not only does not work, but also thought has to be given to the villagers who have to use these roads to get in and out of the village. The further extensive measures which would be required to have any form of impact on traffic levels (i.e. to put people off or dissuade them using this Country lane as a rat run) would have to be at such a restrictive level to have any impact on those coming to and from Bicester and this new estate, as to make it almost

like a prison for the villagers themselves to be able to get in and out of their own village.

146. Once again, in summary, the ill-thought through and ill-conceived plan to add 3,100 new homes to what is presently Countryside will lead to a vast increase in traffic both in and around Bicester but destroying the nearby villages which are directly linked to roads with access points into the development. The only way to prevent the village lanes being overrun by the huge increase in traffic that this vast development would bring is to either, a) not to build such a vast amount of houses (and thereby dramatically reducing the number of vehicles in this rural part of Bicester) and b) not to have access points directly or close to the Bicester-Bucknell Road, along with significantly reduced numbers of households and restrictive measures to prevent the lane being used as a rat run up to Junction 10 or the B430 road down to the A34, all of which would in any event, impact negatively the lives of many villagers.
147. In relation to the Developers plans, they have also altered the outline envisaged by the Cherwell Plan (NW Bicester Master Plan) as to where any connection with the Bucknell/Bicester Country Lane and this estate would occur, as Oxfordshire County Council point out:

*“4. The secondary access off Bucknell Road is much further south than in the NW Bicester Masterplan and **as such it would be less effective at deterring rat running through Bucknell.**”*

148. But additionally, the developers plans envisage a mass of other entry / exit points from parts of the estate (including paths, road access to allotments, sports pitches, burial ground) without any thought being given to the fact that these ingress/egress points are directly on to a narrow heavily hedge rowed country lane.

The image below shows the area where the re-aligned ring road will cut through and across this road, taking with it the present fields and hedge rows:

Along what is presently fields and hedge rows, is where planned shops (of the so called local centre) and the furthest arrow – a primary school are planned to be placed

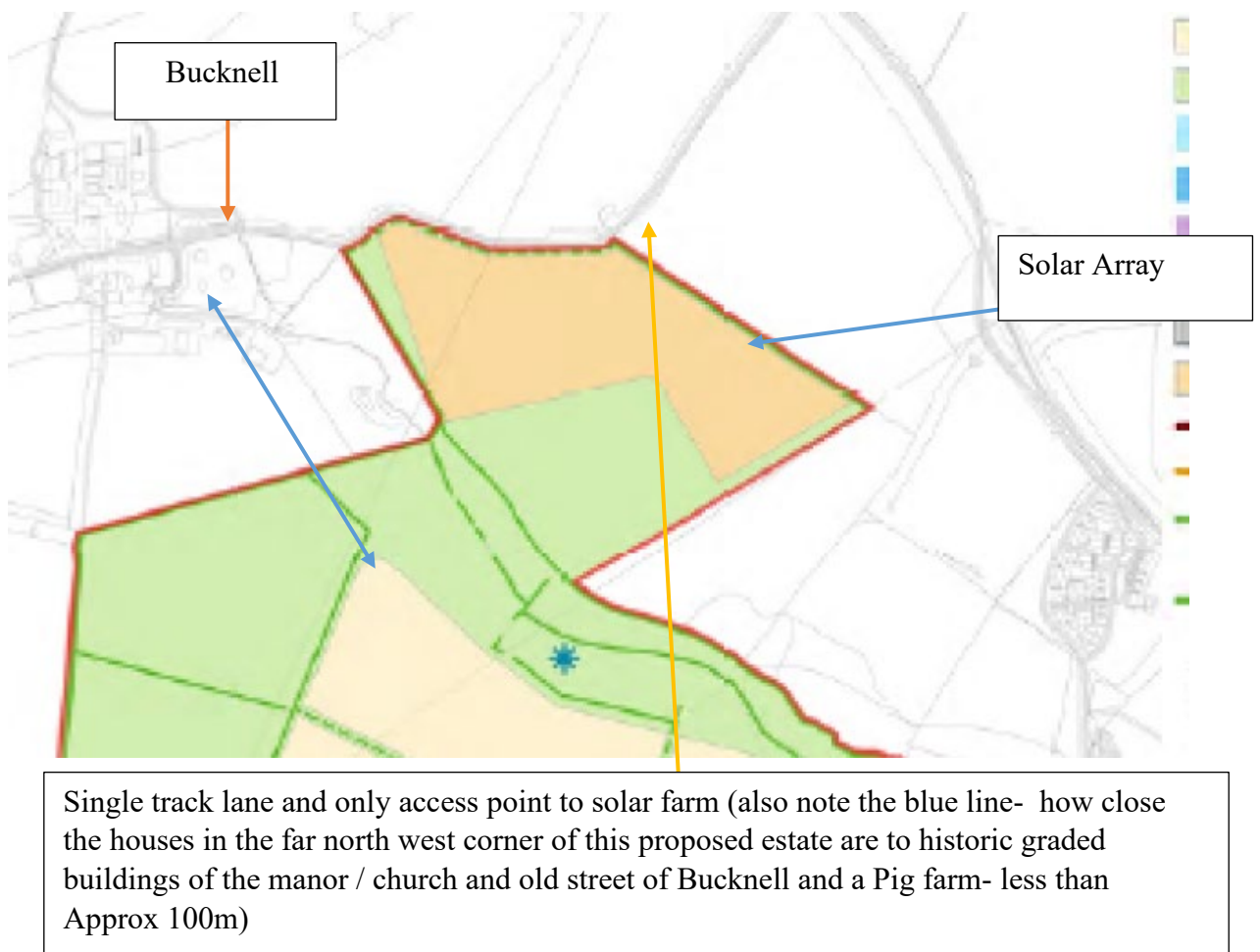


The red line shows the direction and position (although not size) of the proposed large re-aligned ring road

149. And to show the devastation to the Country lane of the numerous, but unspecified and non-detailed other entrances from the estate onto the Bucknell Country lane, the below shows the view towards Bucknell from just north of the present grain store:



150. These further road egresses (and there are a further two directly behind the camera leading back towards Bicester) are into a planned vast burial ground and some other unspecified sports facilities. It is not only wholly destructive to the Countryside and wildlife which live here, but will also destroy the character of a Country lane and village beyond it, but is frankly dangerous bringing traffic out of busy turnings onto such a small lane.
151. The application proposes traffic calming all the way along Bucknell Road and across the entirety of the two images above (the suggestion of some 9-10 sets of traffic bumps / cushions along this little Countrylane).
152. In relation to the other side of the site, there is planned by the developers to be a vast Solar Farm placed on what is a single track (with limited passing points) track and effectively abutting the Eastern part of Bucknell village.



This is what the actual single trac lane looks like in reality and the field which will be concreted over with steel and glass – Solar Farm



153. Oxfordshire County Council Comment about the access to the development along this road :

“5. No details are provided of the proposed accesses off Bucknell and Bainton Road – as the application is for access in detail, scale drawings must be provided showing visibility splays.”

Public Transport (Buses)

154. As to the ill-thought through plans in relation to public transport to and from the site, the developed have simply failed to give any real considerations to the actual challenges and paid lip service, solely in a tick box exercise to be able to claim in sales blurb of this application that this is a site/estate where vehicular use will be limited, without any real idea of problems with servicing such a distant and unconnected site by public transport in the long term and without any real consideration within the plans as to how public transport works.
155. In short in order to be an alternative to cars, public transport has to be:

- a) very regular
- b) cheap
- c) go directly and quickly to work/school/shops or a further transport hub (such as a station)
- d) be sustainable in the long term, or risk becoming a burden on the tax payer for years to come and which will eventually be cut from funding and then lost
- e) Have regular stops, so that customers are close to the nearest point for getting on / off, have roads wide enough to take the buses and priority access to and from and along access roads (with bus lanes and a like) It is to be noted that North West Bicester into the centre has no dedicated bus lanes or any space for any.
- f) and ultimately the service needs to attract customers away from the ease cars

156. As part of their planning proposals, the developers assume that existing services which pass the boundary of the Site (E1 and 505 service could simply be diverted on a route into the new estate). In a detailed response from Stagecoach the leading national bus and transport company, they point out that;

*“We accordingly would advise that the applicant and other stakeholders, including the Local Planning Authority would be prudent to assume that neither service E1 nor 505 form part of a secure baseline level of bus service provision within the broad vicinity of the site. **This is a rather different conclusion than that presented in the applicant’s Transport Assessment***

Regrettably, it is not possible to avoid the conclusion that there is no existing bus service offer on which to build. This requires an all-but-standalone approach to be taken if the development is to benefit from public transport provision.”

157. Given the developers primary plan of using an existing service are clearly unworkable, there is a distinct lack of any other provision or plan to provide a public transport service capable of supplying the proposed estate.

158. The only other option, being a specific bus service aimed at serving specifically this estate, however as Elmsbrook has demonstrated, such a concept can survive for the first few years in which it is funded by the developer and Council and as soon as that period

is up, the Council alone can not afford to subsidise what will always be a loss-making route. Also the Elmsbrook bus route shows little and often no take up during the day and has done nothing to dissuade residents from using cars. Stage Coach sets out in details how such a bespoke service is unlikely to ever be financially viable for any company trying to run it and will ultimately fail, leaving no transport to or from such an estate.

159. The transport expert at Stagecoach concludes in relation to the Developers Application:

“The bus route in the Exemplar is far from exhibiting good practice. It is engineered in such a way that a lowest common denominator” approach is taken to speed control, which in practice, to the extent it is effective for general traffic, only serves to slow buses disproportionately. Intricate, quite tortuous street alignments combined with narrow widths, a very high frequency of driveway crossovers and minimal setbacks of frontages from the kerbline actually in practice both reflect and reinforce the fact that design is driven by cars, and their storage and use, above almost all else.”

160. The expert transport report comments in relation to the present plan of the developers:

*“**Any material divergence** [by this Developers Application] from the same formulaic approach typically used to structure urban extensions in the English shires **is extremely hard to discern.** This has typically **produced exceptionally high levels of car dependency.**”*

161. Given the above problems outlined by the bus expert it is difficult to see how the developer could remotely hope to deliver on their promise in their own application that:

*“**High quality bus routes will be provided, diverting into the site, or facilitated to support frequent and direct bus connection to the rest of the NW Bicester allocation and to other key local destinations;***

The majority of the dwellings will be within 400 metres of a bus stop with all dwellings within 600 metres of a bus stop.” (Design and Access Statement p. 49; 88)

162. Indeed, it was part of the stated aim of the Cherwell Plan for any development of NW Bicester that any development provides:

“Good accessibility to public transport services should be provided for, including the provision of a bus route through the site with buses stopping at the railway stations and at new bus stops on the site”

163. One of the key aims for Cherwell Plan in relation to the transportation issues of any development of NW Bicester was that it provided:

“New links under the railway line and to the existing town”;

“Integration with existing communities.”

“Contributions to improvements to the surrounding road networks, including mitigation measures for the local and strategic highway network,”

“Measures to prevent vehicular traffic adversely affecting surrounding communities”

164. The present designs and plans of this developer could not be further from achieving any of these objectives if it tried. There is no funding or alternative plan in place for a link road to be achieved by these developers either under the railway bridge (re-aligned Howes’ Lane) or any connection or improvement to existing connections to the existing town.

165. There is no “integration” with the existing communities, indeed because of its positioning on the other side of a busy ring road, it creates a classic separation from existing communities, which has generally been abandoned decades ago in town planning as causing isolation and ultimately, several generation on; conflict between competing sets of youth, based on post codes / territory.

166. In addition, having this vast estate placed at half a fields distance from the village of Bucknell and routing vast amounts of traffic through the surrounding villages, does nothing to integrate this estate and its occupants into the existing communities and everything to alienate them.
167. The development brings absolutely no “improvements to the surrounding road networks” and absolutely no “mitigation measures” to the local and wider networks. All this development does is increase the traffic problems and lead to collapse of Bicester’s transport infrastructure.
168. Finally, and the aim of the Cherwell Plan which is completely avoided by the developers: **“prevent vehicular traffic adversely affecting surrounding communities”**. The developers lame and frankly inept submissions that speed calming measures (speed bumps) would be sufficient to prevent vast swathes of vehicles from the estate and road system travelling through and ‘rat running’ through the surrounding communities of Bucknell, Ardley, Middleton Stoney, Chesterton and Weston on the Green, is a submission that is not only obviously and logically wrong, but would have become apparent to even the most intransigent developer, if only they had bothered to carry out any proper modelling of traffic creation and flow through the local communities. They have deliberately avoided doing so, to avoid what it will show.

Further Objections from The Highway Agency and Oxfordshire CC to the transport assessment and the Application

169. In Oxfordshire County Councils Key Points of Objections, they set out some of the failing of this planning application and they are themes which echo a number of objections by numerous others and failings in this application which are reflected in the deficiencies in other areas of the application (such as failure to properly model effects):

- “• *Modelling of traffic impact required*
- *Additional information on accesses required*
- *Access strategy requires construction of part of A4095 realignment*
- *Some aspects of access strategy not in accordance with masterplan*
- *Improvements required to walking and cycling network*

- *Parking provision needs to be restricted to support low external trip generation*
Junction designs need further work
- *Changes needed to proposed cross sections in street hierarchy*
- *Travel plan requires further development”*

Oxfordshire County Council Comments on Traffic impact:

170. In relation to the Developers insufficient Transport Assessment, Oxfordshire CC comment, describing the assumptions that the whole Transport assessment and therefore the whole plan, is based upon as being “unrealistic”:

*“The ES states **that the transport effects of the proposals have been carefully modelled, but this is not borne out in the TA** [Transport Assessment]. The ES and TA rely on an out-dated version of the Bicester Transport Model from 2014. The BTM has been updated since then, including development set out in the Local Plan adopted in 2015, including development at Heyford Park, which was not taken into account in the earlier version. **Further work will be required to test the traffic impact of the development using the updated 2031 reference case of the BTM, and to ensure that the site access junctions provide adequate capacity (important for bus access).** **The TA (and the ES) assume that the A4095 realignment is in place.** However, as stated above, the programme for this scheme is no longer certain. For the purposes of modelling it could be assumed to be in place in 2031, but not before 2026.”*

*“The TA argues that the number of external vehicle trips generated by development north of the railway in 2031 would be lower than those assumed in the original modelling of NW Bicester, **despite the number of dwellings proposed being significantly more.**”“.....While I accept that trends in travel are showing a downturn in the number of trips, **I don't think some of the assumptions are realistic**”.*

171. The National Highways Agency in their objections points out damningly, how not only have the developers not carried out their own detailed modelling on the effects of the vehicles produced by this estate, but have simply taken an old “undermined” and

flawed assessment in support of a 2014 application (8 years out of date) and adopted it as there own:

“The current application assumes the modelling/analysis undertaken for an undetermined 2014 application for effectively the same portion of NW Bicester almost ‘as is’, arguing that the proposed development will generate less traffic on the external highway network than the previous application and therefore the mitigation considered suitable at that time is still relevant to mitigate the proposal”.

172. It is submitted, that it is extraordinary for a development of this size and value, for the developers simply not to carry out proper modelling, but instead to adopt assessments of others, with different size and road layout and then to make things worse, simply suggest (without any evidence or survey carried out) that the proposed estate will produce less traffic than the previous application, despite having 500 more dwellings and over 1,000 more adults and by statistics at least an extra 600 vehicles. Such a submission reflects the fact that the developers feel confident or are arrogant enough in their application, that they can simply state anything they wish (with little or no basis in truth or science) and assume that no one in the planning department or committee will challenge it, let alone question the flawed assumptions upon which this whole application is founded.

173. The National Highways Agency argues correctly that *“It is for this development to undertake its own assessment to understand its impact at junctions”* and this should have been done and responded to before any designs for the estate were ever completed, let alone submitted for planning permission.

174. In Oxfordshire County Council’s Scoping response they set out that:

*“For transport purposes, committed development to be included in the cumulative assessment will need to include permitted non-Local Plan development, which is not currently included in the Bicester Transport Model. This includes **the Great Wolf leisure resort at Chesterton**. The impact of the proposed **Oxfordshire SFRI** [The freight railway development at Ardley] and **logistics proposals at nearby Baynards***

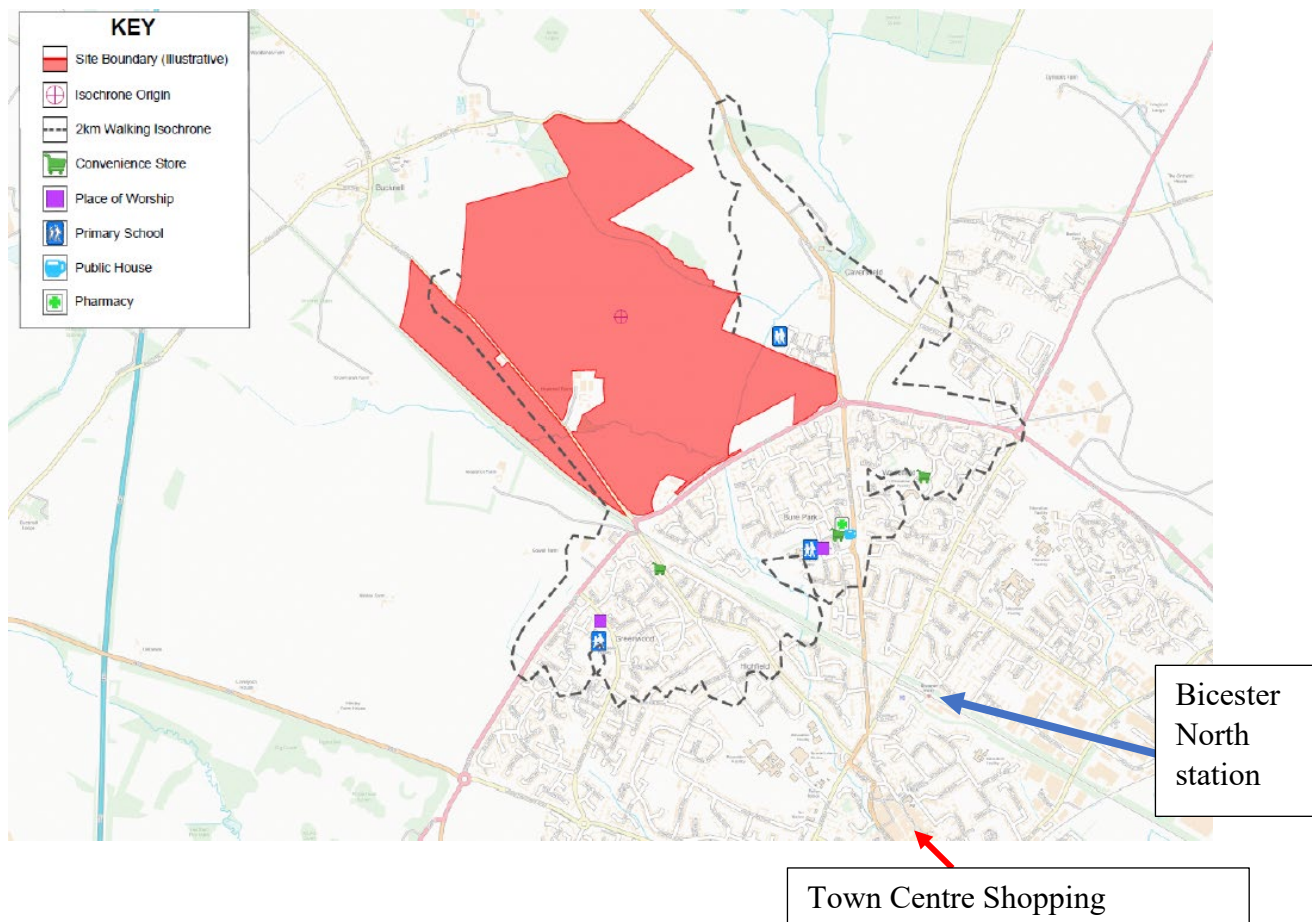
***Green should also be taken into account.** This, as well as whether there are any other projects that should be included, should be discussed further with OCC.”*

175. The developers despite being aware of this before submitting their planning application, have simply chosen to ignore this and instead relied upon outdated assessments by others, which could not and did not take into account all these other recent developments. Which means that the deeply flawed Transport Assessment and through it the Plans which rely upon it are simply not fit for purpose, let alone appropriate to attempt to support such a wide ranging and damaging development.
176. Oxfordshire County Council even set out within the initial scoping report that an “impact assessment” be carried out so National Highways can properly consider the impact on the surrounding strategic road network (not even the local road network, which should also have been properly assessed), but the developers again have chosen simply chosen to ignore these requirements:

*“Whilst National Highways seem to have agreed that the potential impacts on J9 and J10 of the M40 could be scoped out of the ES, OCC have advised that before this decision is taken, **a proportionate impact assessment should be undertaken.** National Highways will expect to consider, through the application, the impact of the development on the Strategic Road Network as it will be important to ensure that it can continue to operate safely and efficiently...”*

Walking and Cycling

177. One of the stated aims of the application and which is part of the stated ideals of the NW Bicester development plan, is to encourage cycling, walking and public transport.
178. In relation to walking the developers provide in support of their application an ‘isochrone’ to show distances from the estate on their plan:



179. As can be seen from the developers own calculation, the main transport hub (Bicester North Rail) lays considerably outside of the 2km mark (and 24 minute walk time) from the centre of the site and in a position approximately 3 km from centre of the development and considerably further (up to 4-5Km from the furthest homes) at the extremities of the built area of the proposed development.

180. The other transport hub of Bicester village station is a kilometre and a half further on and the town centre for shopping and leisure around 3km to 3.5km, considerably further from the extremities of the development. How is that encouraging walking, especially for those with ailments, or elderly or the young ?

181. Having undertaken the walk myself from the proposed extremities of the dwellings to Market Square in Bicester it involved an unpleasant walk (largely abutting very busy roads) of closer to 40-45 minutes, given the need to cross a number of extremely busy roads and the waiting time for traffic light controlled crossings involved (none of which

is taken into account on the developers assessment, based purely on average walking times for set distances).

182. It is not clear how it could be possibly be suggested by the developers that this design could encourage people to walk such distances to and from the nearest transport hub? Or to and from the even more distant shopping and socialising area of Bicester Town Centre. Only the most extreme athlete would be remotely tempted to take this journey twice a day to and from a commuter train and it can be safely assumed that in anything other than the hotter days of summer, few if any commuters living on this estate would risk adding an hour and half time daily in rain and wind, to their daily 2 hour plus commute into London or Birmingham. Such submissions by the developers are not only fanciful but quite frankly untrue and using deliberately misleading data.
183. The developers claim that their plan encourages cycling, yet there is little or no proper storage planned for and as the Bicester local cycling group commented; where are the safe, separate cycle paths in the development plan across the development and how is it proposed that they will link to existing bike routes and what plans are there to improve the insufficiently sized, potholed and limited in length, cycle route down the Bucknell Road through the Northfields estate?
184. Although the developers suggest in their planning that one of the major cycle lanes into Bicester would be down the Bicester/Bucknell road, they clearly are unaware that within 200 meters the present cycle lane ends, the would be cyclist is met with a road which is too narrow to add a proper sized cycle lane and which has vehicles parked along either side of the carriageway due to houses along this road having limited or no driveways and parking.



185. However, even the few hundred meters of cycle lane that is actually present, is not as wide as is statutorily recommended and is not only pot holed and poorly maintained, but in rain becomes flooded with water, causing anyone who uses it to ride into Bicester to ride in the middle of the Road and take their life in their hands.

186. Elsewhere, the developer suggests secondary cycle access to and from the site on the Bicester/Bucknell Country lane, which is again insufficient to handle a cycle lane and is

poorly maintained and due to have (elsewhere in the developers plans) numerous vehicular turnings and speed bumps.

187. The reality is that the developers cycle provision within their plans is superficial at best and shows little or no cutting edge thinking as to how to make cycle use easier, safer and more attractive and has the appearance of purely playing lip service to the concept of encouraging cycling.

Environment

188. The likely environmental impact of this development has simply not been considered appropriately or at all by the developers. The developers choose to describe this housing estate under a pseudonym of being a “village”, it is not. Simply creating 3,000 houses and dumping them onto the Countryside, does not create a “village” it simply creates yet another housing estate for Bicester and one which seemingly has none of the character, history, or social cohesion that a village has.
189. But having such a mass of houses and people placed a matter of a few hundred metres from and in view of historic land, a listed Manor House and a number of historic and listed properties will as a result, cause irreversible damage to the local environment and the actual village which is here.
190. Such environmental damage comes from more obvious sources such as destroying the natural habitat of fields, trees, crops and hedgerows which presently support a mass of animal and plant life, to destroying the farms that use the land presently to farm, both arable and livestock, to damage to the water course and water table and the natural flow of streams and flow of rainfall. But also, includes, noise damage from the noise created by such a mass of properties and their everyday use, fumes caused by traffic and machinery connected to the building and use of such an estate, to the damage caused to the environment by light encroachment or light pollution.
191. In response the developers have claimed that their plans will in fact create a net 15% ecological gain! On closer inspection of such a claim (made by the head of the developer’s ecological team, who himself has absolutely no ecological training or

education), it became apparent that this claim comes from a mathematical process of simply allocating to each hedge, field or tree a pre-determined value and then, if certain hedges are maintained then this in turn leads to the score from that hedge being kept. However, such an approach is deeply flawed in science and in logic.

192. On that basis, the developers gleefully announced that the present arable fields or even the grass fields which sustain a heard of milking cattle are on this equation of low value, so the simple planting of a few low grade trees will outweigh the credit attached to acres of farmland. Such an approach is utter nonsense. The farm fields not only photosynthesise the carbon dioxide into oxygen in large quantities, they become home to a mass of insect and animal life and thereafter all of those animals which survive up the food chain. If you destroy their habitat, you destroy the habitat of birds of prey, foxes, Badgers, deer and all the other animals that live there.
193. But a simple mathematical equation overlooks the reality of nature. If you have a hedge in a field adorned with wild-flowers it attracts bees, insects, birds, rabbits, mice, voles Badgers etc. If you take the same hedge and surround it by houses, concrete, tarmac and human beings right next to it, then the animals/insects will not remain and neither will the flowers and plants which often rely on the animals and insects to pollinate them. So far from maintaining the same value, the hedge becomes next to worthless in ecological terms.
194. It is difficult to understand how anyone could plausibly attempt to submit as part of a planning application that concreting over Hectares of Farmland with concrete, tarmac and brick, could in fact create an ecological “benefit”.
195. The concept that this estate is in some way an “Eco” option is simply a deception aimed at persuading a planning committee that in some way such a development is positive for the environment; it is not, a development of this size is vastly damaging, both short term (in the building) and in the long-term destruction of the natural environment.
196. At present the land which the developers seek to place this on is green belt (even if not afforded green belt protection) agricultural land. There, are a number of farms, the fields which will be built on (or even sculptured by the developers) are presently grazed

by cows and livestock and grow crops. It consists of large amounts of hedgerows, trees and wild areas. It is inhabited by hundreds of birds, insects and animals. These are real living things, not just words on the page of a developer and all would be destroyed, if this plan were to succeed and none could ever be returned.

197. If this development on this scale is allowed, all of this will be lost, the trees and fields taking carbon dioxide out of the environment and turning it into oxygen and acting as the lungs for those living around the area, will instead be concreted over, the animals will lose their environment and it will be replaced with concrete, tarmac, metal and glass of a solar farm and the only hint of the colour green, will be from the manicured and no doubt tarmacked footpath settings of sports fields or even the suggested burial grounds Or the plastic of the AstroTurf sport field, along with its floodlights, noise, cars accessing the grounds and concreted changing facilities.
198. In addition, we are at a stage in history, following the Pandemic where we are just starting to understand the benefit of the Countryside to our mental health and from Brexit, War and now through the environment and the carbon footprint of importing our food, we are again understanding the premium value of farms and farmland and the need to maintain them to feed the population. None of this was the policy or even properly understood in 2013/14 when the original concept of NW Bicester was first drawn up.
199. In the wider community, instead of growing and farming on a sustainable local level, another large source of food will be lost, and such food will have to be imported from further afield leading to greater pollution.
200. Nor back in 2013/14 at the time of the development of the original Cherwell Plan and the concept of development on farmland at NW Bicester, were there many other choices. MOD Bicester land South-East of Bicester was and that it was made clear at the time of the Cherwell and Bicester Plan, would never be made available by the Ministry of Justice. 8-9 years on and all that land has now become available for development and is already on the 'right' side of Bicester close to numerous transport links, without having to travel through Bicester, it is close to the waste water provisions

and also already has in place large amounts of infrastructure and effects no surrounding villages.

201. To push ahead with plans to concrete over a green field site on the wrong side of Bicester and lacking in any infrastructure, instead of developing the brown field land available South-East of Bicester is utter madness and a process of stubbornly following a plan, however flawed that plan turns out to be.

202. 3100 households along with flood lit pitches and walkways will cause massive light pollution effecting and damaging animals for miles around as well as effecting human beings and in particular the nearby Bucknell village, which is proportionately affected by light the closer that man made light producing environment encroaches to the village. On the present plans, floodlight from pitches, lights on manmade walkways and street lights and house lights emitting from the nearest homes, will all be less than the length of a football pitch away from the boundary of the village and will be a constant glow on the horizon for the village. If there is any doubt as to the effect of such light, simply travel around the link road around Kingsmede in the early evening and see the effect of light seepage from the sports pitches across the entire area, yet the plans have such light pollution on the present plans only the width of a small field away from the houses on the outskirts of Bucknell village.

203. 3100 properties with over 7,440 plus people will bring a vast amount of sound / noise pollution again effecting humans and animal life for miles around. Once again, the village of Bucknell will be proportionately affected the closer the boundaries of this development are to the village itself and on present plans, with no real sound or light barrier (such as woodlands) between the village and the development the light and sound pollution created will be vast and unliveable.

204. Especially as on the plans the nearest houses at the north-western side of this proposed site will be less than 100 meters from the most southerly businesses and houses of Bucknell village and around 200 meters and in direct line of site for a number of listed buildings such as the Church, Manor and numerous houses on the Bainton Road and in direct line of site from the garden of the Grade 2 listed public house in the village of

Bucknell. Additionally, on the plans, there is planned to be Sports pitches / Astro-turf and the associated noise and lighting in that same close proximity to the village in the north-western corner of the site.

205. Flood risk is a very real concern of this proposed development. For each meter of concrete, tarmac, or even Astro turf laid down by the developers and their machines, is a metre of field and soil that can no longer consume rain and flood water. The local village of Bucknell has suffered repeated flooding in recent years, due to a complex mixture of reasons, but linked ultimately to the increased development of Bicester and the strains that this puts on the water course and drainage downstream (namely in Bure Park, Southwold and Northfields). Putting 3,000 plus households on fields that presently subsume flood, rain and run off water will store up an even greater flood risk, which has simply not been properly considered by the developers.
206. In summary calling something a village or labelling it as “Eco” doesn’t mean that the development has any real ecological credentials or that a housing estate becomes a “village”, and the planning committee should be under no illusions that the building of a vast estate on green field land does not produce a single benefit for the environment, but comes with a whole infinite list of damage and destruction which is wrought to the environment and those who live nearby from animals to humans and the bigger the development, and ones as vast as the present one, cause the most, the bigger the environmental damage and impact. The present plans, provide absolutely no environmental benefit but will instead destroy large tracts of farmland and animal habitats which will never be seen again.
207. In addition, knowledge of the impact of potential environmental damage and public opinion has developed significantly in the last few years and significantly from even when the Cherwell Local Plan was first developed and as such a full environmental impact survey by a properly qualified and independent assessor should be carried out, so the committee and indeed the local population is properly informed of the full effects of such a vast development on light pollution, noise pollution, environmental pollution and environmental and habitat damage, before any proper consultation can occur and any rational and reasoned decision made.

208. But to be clear; concreting over a field, let alone many fields, is not “environmental” or of ecologically beneficial to the environment in any shape or form and neither is putting a vast solar array across farmland which would otherwise house a mass of crops, and sustain animal and insect life. Destroying the local environment runs contrary to common sense and indeed recent Governmental policy at local, national and international level.
209. Proper sustainable development requires consideration of less densely populated housing over smaller areas and where possible the use of brown field sites, but also requires proper environmental mitigation, where some housing on green field areas is a necessity and cannot be avoided then there is an emphasis on proportionally larger use environmental mitigation measures, such as large areas of woodland, hedges, ponds, lakes and wildlife areas, being left untouched in and around the development and used to properly buffer the development from those who will be effected.
210. None of that has been dealt with within the present plans adequately or at all. The present plan seems to simply aim to pack the houses in as densely as possible (and therefore create as much profit for the developers as possible) whilst paying lip service only to environmental concerns, by somewhat ironically proposing to extend the planned area this development covers and then using that extended area to put in manicured areas of social use. Such as a cemetery and sports fields. Such a suggestion shows no insight as to the damage that such a large scale development causes, let alone any proper mitigation of that damage.
211. Although, sports fields, Astro-turf, cemeteries and manicured sculptured walkways are mildly more beneficial than concrete and tarmac and the metal and glass of a solar farm, it still destroys the natural and animal habitat and brings with it, its own pollution, such as the light pollution of the lighting for school or sports fields, noise pollution from the users of such areas and damage caused by the machines used in the upkeep of such areas.
212. In short simply dumping a sports field or a cemetery at the edge of the development does not mitigate the environmental impact of such a vast project and does not mitigate

in any way the damage done by it or the impact it will have on the village next to it. The present proposals lack any consideration, let alone proper detailed assessment of the environmental impact of such a large development and how best to mitigate the damage caused.

213. It is also clear that there have been no studies or modelling undertaken by the developers in relation to establishing the effects of this development upon the following environmental areas:

- a) the increased noise effecting Bucknell village / or Elmsbrook or Bure Park
- b) increased levels of pollution on the background levels of pollutants in and around Bucknell village (already near the maximum safe level due to,. Proximity to M40, Proximity and effect of the incinerator and development of Junction 10 / Ardley)
- c) the effect of increased light pollution from housing, street lighting, sports lighting etc on the abutting communities

214. The developers proposal includes adding a large burial ground in close proximity to the village boundaries of Bucknell, yet the developers appear to have no idea how many bodies is it anticipated this ground will incorporate or how the Parish Council could afford to underwrite the cost of such a vast burial ground, which will remain the responsibility of the Parish Council into which the land falls, at least in the medium term, of a decade or so, whilst any application to change council boundaries is made?

215. Additionally, it has been noted in comments on the Plans by Oxfordshire County Council that:

“A tributary of the River Bure flows eastwards through the site. This has not been modelled. Modelling is required to confirm the extents of its flood envelopes.”

216. Once again, no such modelling has been carried out by these developers in respect of yet another key area of their plans.

217. In the developer’s health assessment it is claimed that:

“some 3.7ha of allotment/community farm, which is likely to encourage the growing of fruit and vegetables for local consumption”.

218. Once again, the lack of logic in such a suggestion is startling. If the developers plan is allowed to go ahead, the County will lose at least two large farms arable and cattle farms, producing between them, large amounts of food for the population. The developers instead propose to swap real farms with a ‘pretend’ farm showing people what a farm may look like, if they hadn’t built over it and instead of industrial provision of food for the population (which is required), this is exchanged that with the odd vegetable grown on an allotment for the consumption of only the person growing it.
219. However, even the ‘petting farm’ is not even on this development, it in fact appears in the plan for the next door Himley Village.

Noise pollution

220. In relation to potential Noise pollution, the developer have at least commissioned a ‘noise survey’, although the noise survey relied upon by the planners, is in fact based on data said to have been obtained by those employed by the developers, carried out at the site between “25th February 2021 and 1st March 2021.” That was during a period of national lock down. It is obvious that data obtained during such a period of lack of movement and traffic is an inappropriate and unreliable data set upon which to base a reliable study of potential noise pollution.
221. However, it gets worse, the 3 sites chosen for the acoustic tests, were all on the extremities of the proposed site and in one of the 3, next to the railway line. None were either in the village of Bucknell, or on Bure Park, or Elmsbrook, or indeed within the actual proposed development site itself and such tests provide no assistance with:
- a) the present noise levels at peak time (in normal working days) for properties on the proposed development itself, let alone those positioned close to the main roads
 - b) nor, the present noise in Bucknell village, Bure Park, Elmsbrook or any property abutting the B4095

OR

c) provide any assistance at all with modelling and predicting the future noise pollution created by the proposed new estate on the existing communities of north Bicester and Bucknell

Amenities

222. On the current plans there are no provision for a public house, a church, a local hall, youth club, or even a gym or leisure centre or indeed any other form of social centre. With the nearest church and chemist quoted as being a 21 minute walk to Bure Park.
223. In order to create a community it is not the case of a developer simply dumping houses on a patch of land, community needs to be built and requires cohesion and social interaction, this sole-less design contains no amenities at all, or perhaps the developers envisage that the 7,440 to 13,600 inhabitants will simply meet outside the ubiquitous Fish and Chip shop which will form the ‘local centre’?
224. Somewhat ironically the developers boast within their applications “health impact” assessment that “*The health impacts of the development are judged to be positive in relation to planning for community inclusion*”. It is not clear who has “judged” the health impact of building over green fields, uprooting carbon dioxide absorbing trees, hedgerows and plant life to be a positive health impact, except the developers themselves, or how it can seriously be suggested that a vast development with no amenities can seriously be described as providing positive community inclusion.

Policing

225. Thames Valley Police have provided a detailed critique of the design put forward by the developers and set out how the design will increase cases of crime and anti-social behaviour.
226. As recently as the 17/02/22, Thames Valley Police were reporting a large increase in vehicular crime on the supposed (car neutral) nearby Kingsmere estate (which tie into their observations about the lack of planning to prevent crime, in relation to this proposed Hawkwell estate):



Medical Provision

227. As the NHS OXFORDSHIRE CCG stated in their objections to the plan:

*“the original “Adopted Local Plan In recognition of this need the Infrastructure Schedule in Appendix 4 of the adopted Partial Review Plan **lists improved health provision is critical** to ensure that health infrastructure grows at the same rate as communities.”*

228. Yet despite this, the development has NO provision of any medical services, there is no GP surgery, no dental practice, no social care or elderly care provision.

229. In their medical assessment, the NHS conclude that the planned site will produce some **7,440** extra people and state, that due to the positioning of this development:

*“Whilst we appreciate the Reg 122 CIL tests require us to consider developer contributions for this site only, **we must also recognise the considerable growth on this north west side of Bicester, and the considerable pressures it will put on all health infrastructure across the town**”*

230. The NHS as a bare minimum are requiring a “gifted site” of around £3.5m in value and £2.67m S.106 funding to be able to cater for the extra people on the developers proposed development, it is not been made clear by the developers whether they have identified the ‘gifted site’ required within their development or are prepared to guarantee the required **£6.17m**, to prevent the collapse of the primary health care in the Bicester area caused by the at least 7,440 extra people created by this proposed development.

231. The NHS in their objections, concludes echoing nearly every other contributors view of the inadequacies of this planning application:

“Having appraised this document, OCCG find **it totally inadequate in terms of considering the health needs of this population, and object to this document being accepted as sufficient in the planning application**”

232. However, the Town Council have been here before. In relation to the “Himley Village” development and the further application in 2019. One concern Bicester Council was reported to have had was about whether a GP surgery to serve Himley Village, that the developer, Portfolio Property Partners Ltd wanted to provide ‘financial contributions’ to, would actually be delivered.

233. Councillor Lyn Pratt (Bicester North and Caversfield), is reported as indicating that she did ‘not think it will happen because of the decision made last month to build a ‘super surgery’ in the south of the town.’

234. She is quoted as saying at the time: “I’m quite concerned about that (the GP) because I don’t think it would happen. We had a similar problem in Kingsmere where all along houses were sold with the provision of a surgery and now that’s not going to happen – it’s going elsewhere - and that’s down to the decision of the doctors in the town.”

235. Upon this promise of investment in a new surgery in North-West Bicester, Independent County Councillor Les Sibley (Bicester West), seemingly taken in by the promises, “welcomes the proposal of a surgery in NW Bicester, and believes big estates such as the Eco Town, which will eventually house around 20,000 people, **need their own**

GPs..... (He Continued): “It’s great news. If this GP surgery is to be situated there, it will be fantastic news and I’m sure the current residents will welcome that proposal, but I do have some concerns. We need GPs -these estates are huge **and they need their own GPs.**”

236. Well unsurprisingly 3 years on, there will be no medical provision for Himley Village provided, despite what the developers promised, there is and will be no medical provision on Kingsmere, despite the promises of the then developer and there will be no medical provision on this proposed development.
237. Indeed, it is apparent that the lease will shortly be up on the GP Surgery in the centre of Bicester and all medical provision will be moved to the far side of Bicester from the present development at a surgery on Graven Hill, which will not have the capacity to provide medical care to another 7,400- 13,000 people.

Village?

238. Bucknell village has around 260 people in it (under the last census), in under 100 properties, it has a historic Church, village hall, playing field, historic listed houses, a listed public house and Manor house, it is based around farming and the fields which surround it. In many ways, the village, despite gradual and sustainable growth, has changed little in hundreds of years.
239. It has a pub, it has a village hall, with weekly Post Office, Bingo night and film night. There is a cohesive community.
240. By contrast the proposed development of a “Hawkwell Village” is no village at all but 3,100 households with over 13,000 people, that is not a village, but a creation of a whole new town in the green fields surrounding Bicester and attached like a boil to the skin of Bicester and in turn subsuming the existing actual village of Bucknell and the homes of Elmsbrook, Bure Park and beyond.
241. A village by definition is “a group of houses and associated buildings, larger than a hamlet and smaller than a town, situated in a rural area”. According to the Collins

English Dictionary: “A village consists of a group of houses, together with other buildings such as a church and a school, in a country area.”

242. These proposals by contrast are the size of a small town, simply grafted onto the existing urban sprawl of Bicester, they contain no Church, no school and are no longer in a country area and ironically if these plans are allowed, they may not create a village, but would certainly destroy one in the form of Bucknell.
243. Indeed, the developers repeated description in their sales pitch for this development of this being “Hawkwell Village” to describe this proposed housing estate are almost certainly committing an offence under S.2 Fraud Act 2006 where it is an offence for someone to dishonestly makes a false representation (suggesting that 3,100 houses is a “village” is such a false representation), and it is done “intending to make a gain for himself or another” (the claim of being a village is done to sell more profits and create a larger profit).

Conclusions

244. The proposed development presents a clear and present danger to the existence of this historic village and hamlet of Bucknell and all the communities of NW Bicester. Having an urban sprawl, a matter of meters from the village’s boundary, introducing more than 50 times the number of people to this small area of Oxfordshire will simply lead to the destruction of this historic village and will be a precursor for the village being totally subsumed within Bicester, that is not right in common sense, or within planning aims or law.
245. I have tried to outline above a number of the effects which the presently proposed development will have on local hamlets such as Bucknell, but also from the existing residents of Bicester, from a massive and unacceptable increase in the use of quiet country lanes (two out of the three going through the village including the one upon which the solar farm is planned to be built are single track lanes), totally unsuited to the mass increase of traffic which this development will bring, to the effect of those living close by and the collapse of local infrastructure serving the current residents of

Bicester, from traffic chaos, to inability to police or provide medical care, to unforeseeable damage to wider Oxfordshire from the water and waste requirements.

246. There will be a vast and unmitigated environmental impact to the village and its occupants and to those in NW Bicester, both in forms of noise, light and air pollution and a strain on the utilities, such as water and sewage.
247. The plans as presently promoted envisage bringing the development right up to the boundaries of the village and the suggestion that present farmland along the rail track side of the development can be turned into some sort of mass cemetery abutting Bucknell.
248. Put simply, the size of this vast plan is directly related to a number of the issues raised in this and other objections, the larger the development, the more traffic, the more damage to the local infrastructure. The larger the development the larger the damage to the environment, the larger the development the more impact on the nearby village and pre-existing communities etc and simply grabbing more land to destroy as part of this development and then to claim that it is to benefit the existing communities and environment; is not an appropriate answer or suggestion.
249. The present plans are defective and considerably too large to be sustainable on any indicator and a considerably more modest development, containing more environmental mitigation and large buffer zone, contained at the very least, within a much smaller footprint than that envisaged by the Cherwell plan may well be a plan that could allow for some more sustainable development to occur, but these present plan falls far far short of that.
250. Councillors, Honourable Members of Parliament, the planning officers and committee alike should be under no illusion, this plan if allowed, will directly lead to the destruction of Bucknell village and lead to Bicester subsuming a village in a way that has been prevented on all sides of Bicester to date and in all previous planning applications up to the present day. But further, it will blight the lives of many hundreds if not thousands of people in the wider communities, be it the areas of Bicester effected

by the increase in traffic, noise and pollution to the villages which will be used as rat runs by the mass of commuters that such a vast development brings.

251. With previous large-scale developments in and around Bicester, there has been some foundation and logic or even infrastructure to support it. Kingsmere was developed on the Southwest corner of Bicester in the 4th and last undeveloped segment of the Bicester sphere. It was on the correct side of town to easily access the motorway and Junction 9. It brought the building of its own ring road by-passing it and providing access to and from the site. It brought its own schools and a vast amount of land mitigation, to mitigate its effects on the eastern end of the nearby village of Chesterton. Graven Hill is being developed on Brown field ex-MOD land, with easy and direct access to the M40 and A41 to Aylesbury.
252. This proposed development is on the wrong side of Bicester for access, it is vast in size and has no natural access to the infrastructure or routes away from the estate, without funnelling traffic through the villages themselves. It gives no consideration to the damage it will cause to the local villages and people living in the area or the environment generally.
253. To add to the destruction of this Application, the application itself reliant on misleading claims and data, which only require a scratching of the surface to see why the claims are simply wrong or not deliverable. Instead of undertaking proper and detailed studies and modelling of the impact of the developer's concept and then amend their plans before submitting them, the developers have failed in almost every sphere to undertake proper scientific evaluation and modelling, often relying on bland national statistics, or worse other peoples outdated data for a different sized and shaped project.
254. The result is that this whole application is based on false premises and false promises, wrapped up in the deployment of key-phrases and terms which they believe the planning authorities wish to hear, but without any real evidence this plan would come anywhere close to delivering it and when that fails, the developers use a double-speak which would even make Putin proud, telling everyone one thing with certainty, when even a superficial questioning of the facts and logics behind the claim, show the opposite to be correct.

255. For all these reasons, the application in its present form and size and position should be rejected.

19th March 2022