Comment for planning application 21/04275/OUT

Application Number	21/04275/OUT
Location	Part OS Parcel 8149 Adj Lords Lane And SE Of Hawkwell Farm Lords Lane Bicester
Proposal	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	Caroline Ford
Organisation	
Name	Alec Jones
Address	Laneside House, Bainton Road, Bucknell, Bicester, OX27 7LT
Type of Comment	Objection
Туре	neighbour
Comments	I strongly object to this application. Please find attached a document outlining why.
Received Date	28/03/2022 15:34:26
Attachments	The following files have been uploaded:

• Alec Jones - Hawkwell Village objections.pdf

A major part of dressing up this plan is the claim that there will be a net gain in biodiversity of 10% from current levels. The 'credit system' carried out to ascertain the current level of biodiversity are inadequate, one of the main issues being the lack of distinction between permanent pasture and arable fields. While attention has been paid to birds and land mammals, hardly any has been given to the insects and millions of other organisms that live within the soil. It is well known that permanent pasture supports much more biodiversity than the average continually cropped arable field.

These pastures have been under grass and managed with cattle for decades. Over this time soil health will have built considerably, one teaspoon of healthy soil can contain up to 1 billion individual micro organisms belonging to 10,000 different species (UK Centre for Ecology and Hydrology). These micro organisms play a vital role in providing all plants with vital nutrients and by moving around, aerate the soil and help with water drainage and retention.

In a world facing the impacts of climate change, we need to be taking seriously the role that grasslands can play in carbon sequestration. A report (THE ROLE OF NATURE IN A UK NDC published in November 2020) by RSPB and WWF UK shows the immense importance of permanent grasslands and rough grazing pasture for their potential carbon storage – even more than our woodlands. It recommends the preservation of grasslands and other open habitats as a priority action. More globally, the Royal Society has estimated that the worlds farmland has the potential to sequester 10 billion tons of CO2 pa, more than the annual accumulation in the atmosphere. Here in NW Bicester, we can play our part and lead by example, by not trashing what has become quite a rare landscape.

The built part of this development is largely to be built on permanent pasture. If the proposal were to be approved, the precious soil microbiology and biodiversity in that pasture will be destroyed having a huge negative impact on the plants and animals above ground that rely on it. It is also becoming increasingly clear that excessive soil disturbance releases stored carbon from the soil. 20% of the worlds carbon (in organic matter) is stored in the first 1 metre below global grasslands. Over the years, this pasture will have been acting as a rare and vital carbon sink next to Bicester town and the digging up and paving over of this grassland will have devastating consequences for not only the developers ridiculous biodiversity claim, but also, Carbon emissions.

Even once the development is complete, this ecosystem would never recover back to its current level, let alone a 10% increase. On the 40% of the site that is not concreted over, the impact of 7000 extra people (and their pets) and the regular maintenance (no doubt for the benefit of those people, not wildlife) will hamper any attempt by the ecosystem and its wildlife to recover. By removing the animals that manage the pasture (cattle), the soil will be starved of its nutrients and will trigger a decline in biodiversity on the site overall.

The ES documents Arboricultural Assessment states that each tree and hedge row will be given a Root Protection Area (RPA) in order to reduce damage during construction. It admits that tree root systems often extend beyond the standard RPA, but what they have not considered at all, is the critical Mycorrhizal fungi. The Mycorrhizal fungi (MF) network extends below ground level within the top soil connecting plants and trees and enabling them to share nutrients and by colonising the roots themselves, it provides vital extra nutrients and water in times of drought. MF also produces glomalin which significantly increases the soils capacity to store carbon.

Because of the heavy soil disturbance involved, the construction of this development would have a devastating impact on the MF and soil network. The critical MF network covers up to 700 times more area than a given trees roots, meaning the proposed RPA is protecting the existing trees and hedgerows even less than is stated in the Arboricultual Assessment. Furthermore, due to the very limited use of fungicides and herbicides in pasture based farming systems, MF is known to be much more active under permanent pasture. This damage to the MF network will have a detrimental effect on the flora and consequently the fauna on the site and cause a general decline in health. Including the 5 quality Oaks proudly labelled as being retained. There is once again no mention in the Arboricultural Assessment, of the important role grazed pasture plays in tree health.

This argument is backed up by the Environment Agency's report first published in June 2019; The state of the environment: soil which clearly states when discussing soil compaction;

" Construction sites using heavy machinery can cause the subsoil to be compacted - simply adding back the topsoil that was removed <u>will not</u> restore the soil and its functions."

And goes on to say

" An estimated 3.9 million hectares of agricultural land are at risk of compaction in England and Wales, this risk is highest on clay soils during wet periods."

The proposed site for this development is on heavy clay soil and is known to sit wet for the majority of the year.

The National Policy Framework states on paragraph 175 c);

"Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists"

Given the points made and the increasing rarity of large areas of quality pastureland, I think it is fairly obvious that this is an irreplaceable habitat and there certainly is not a suitable compensation strategy in place or an exceptional reason.

In Paragraph 180, the NPPF advises that:

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation."

The development proposal has not taken into account anything from this quote from the NPPF. Firstly, it clearly states that the cumulative effects of the development should be considered. It is clear that this is not the case, as no studies have been undertaken into pollution levels in the area which are currently at the safe limit in Bucknell. This is largely due to the cumulative effects of the Incinerator at Ardley tip and the M40 with its two major, nationally significant junctions, 9 & 10 (plus

Page 2 of 5

services). Amazingly, this is only the current polluters in the area, there are more on the way which the developers have conveniently seemed to miss. These include, extensive warehouse development to the west of Bicester and at the M40 Jct 10 alongside the proposed new rail terminal near Stoke Lyne and the Great Wolf resort water Park near Chesterton. All of these developments will cause a large increase in pollution during construction and in final use, in an already heavily polluted area. It is also clear that no light pollution mitigation has been considered.

The light pollution from Bicester has increased hugely over the last 20 years and this estate will be the last nail in Bucknell's dark sky coffin. Not only that, but the effect of light pollution on the local wildlife will be enormous. They will simply move out, as their ever decreasing habits are squeezed further. As I write this, spring has well and truly arrived in Bucknell and every dusk is greeted by raucous birdsong, as they are called to roost by the encroaching darkness. This does not happen in town and will certainly not happen in Hawkwell "village". Another reason that this absurd "10% net gain in biodiversity" claim is a complete farce and quite frankly, greenwashing of the highest order.

I believe it is worth considering the issue of food security also when it comes to deciding on the best use of land. There are many things putting food security under pressure. In 2015 the UN report on the status of world soils found that 1/3 of agricultural land globally is moderately to highly degraded due to erosion, salinisation, compaction, acidification and chemical pollution and that 25-40 billion tons of soil are eroded every year. This causes a significant loss of productive ground to grow our food on.

Closer to home, the Environment Agency's *The State of the Environment: Soil* report found that in the UK, and I quote;

- "The rate of new soil formation is slow at about 1 tonne per hectare per year. Erosion is regularly exceeding the rate of formation in many areas. About 17% of arable soils in England and Wales show signs of erosion, although 40% are thought to be at risk."

- "Every year England and Wales loses 2.9 million tonnes of topsoil to erosion."

- "Construction sites using heavy machinery can cause the subsoil to be compacted - simply adding back the topsoil that was removed will not restore the soil and its functions."

Aside from the environmental issues impacting our food security there are more economic and political issues. Our modern food supply runs on a "just in time" system and involves many different players and a lot of the time great distances also. We have all seen, over the last few years, what happens when that system is disrupted. And now, due to global politics outside of our control and our over reliance on other parts of the world to provide our basic needs, we are facing yet again shortages and at the very least, price hikes.

Surely, this brings home the critical importance of taking enormous care when taking decisions that further remove perfectly good agricultural land from production. This land currently supports a dairy herd and suckler cows. With good management, these systems can be the most sustainable and healthiest ways of producing food while providing a healthy ecosystem for wildlife. What would you rather? Local, seasonal, sustainable and nutrient dense food produced within our communities by our peers or food produced 1000s of miles away in a heavily degraded landscape with little regard

for nature or animal welfare. I'm afraid this development is another step down the road towards the latter.

Every single field, every single farm yard and every single farming family that is swallowed up by development, is another nail in the coffin for our nations chance at self reliance, good health and a way of life that has been central in this country for centuries. Once that coffin is shut, it is shut.

I wish to point out some practical issues that will inevitably arise from this development. The first is the increased amount of traffic, assuming every household will have two cars, that's 6200 extra cars on the road in and around Bucknell, Bicester and the area more widely. At the recent meeting of Bucknell Parish Council, the only solution to this problem that was proposed by the developers was extra speed bumps and signs along the length of Bucknell road. His theory being that.

"road users would seek alternative routes if Bucknell was made too time consuming to pass though"

This demonstrates a serious lack of understanding when it comes to the traffic situation in the area. What alternative routes? Pushing the problem downstream only makes flooding worse elsewhere. The roads around Bicester are regularly gridlocked at busy times of the day. More widely, The A34 is famous for its queues and unfortunately, its accidents. Locals avoid it whenever possible. The emergency services often use Bucknell and Ardley road as a speedy cut through to the The M40 Jct 10, do we want to slow them down? Are they the people who need to find an alternative route? The simple matter is, that the road network in this area is no longer fit for purpose and struggles with the current load on a daily basis. The addition of further cars from this estate, plus the extra traffic from the other proposed developments mentioned previously, will tip the situation dangerously over the edge.

The developers have said that few people will wish to leave the estate on a daily basis, and therefore not have cars. This is delusional. The estate is providing very little employment within itself and what employment there will be, will be low skilled, low pay and will certainly not provide the income required to afford one of these homes (£300,000 to £500,000). There is no provision for social or affordable housing. The development is also providing zero secondary school places and woefully insufficient primary and nursery places.

It was suggested by the developers at the recent PC meeting that residents could get a bus to one of the nearby warehouses for work. Again, this employment will be low density, low skill and low pay. Furthermore, the main bus operator in this area, Stagecoach, has voiced its objections to the plan saying the routes would be unserviceable.

The Police, the NHS and other services have also voiced objections stating that their already stretched services would simply not be able to cope given the pressures of the extra population.

The most horrendous part of this plan is the obvious land grab that is taking place quietly. The developers claim that this extra land, which is approximately 30% on top of the land outlined in the original Cherwell local plan for North West Bicester is providing a green natural space for the

community and act as a buffer between the development and Bucknell. This will NOT be a green natural space, for reasons I have already outlined and it is once again, more greenwashing, to hide the real reason behind the grab; the maximisation of profits.

The developers are duty bound to set aside 40% of the total land area to green space, nature and recreational areas. This 40% should have been within the original boundary and not stuck on outside on extra land in order to make room for more profitable houses within the development. It is a sly, deceitful plan that was put forward quietly in the hope it would go though without anybody noticing. Public consultation has been nonexistent and notice to effected residents pathetic. We have noticed, and we are not happy.

We have a very real moral obligation to take great care of our precious land and its communities so that we leave them for future generations in a healthy, abundant and productive state, something that this development will NOT do, despite the glossy drawings and biodiversity fairytales.

If you truly care about the people of the local area, their health, their future food security, the ecosystems that we ALL rely on daily and sustainability as a whole, then you will rethink this ill thought out, short term greed driven monstrosity.

The world is changing fast and we can no longer afford to make short sighted, short term decisions based on outdated data and vague targets. We need to be looking forward, generations into the future to make the best use of our precious natural assets. Over development and careless destruction of perfectly healthy land in North West Bicester will seriously impact the ability of those generations to thrive in this area.