

8-9 Bainton Road  
Bucknell  
OX27 7LT

## **Planning Application - 21/04275/OUT**

The planning application should be refused. This development would have a significant and adverse effect on the community of Bucknell and the ability of current infrastructure to support Bicester and surrounding areas. Real countryside environment, habitats and wildlife would be lost forever. This cannot be replaced by manicured green infrastructure made available by developers.

The application is not in line with the Cherwell Adopted Plan nor with the National Planning Policy Framework. Consultation has not been meaningful.

Viewed in the context of existing development in Bicester (both in the Adopted Plan and development which is in addition to that plan) and new brownfield sites that are now available, this development is unnecessary.

### **1 Community of Bucknell**

1.1 *'This is a plan which demonstrates a respect for the past and which seeks to preserve and enhance what makes Cherwell district special; our dynamic market towns, the 60 conservation areas, our beautiful villages and wonderful landscape.'*

CLLR Barry Wood. Leader of the Council.

The above statement, taken from the cover page of the Cherwell Adopted Plan, cannot be reconciled with this planning application. The historic village of Bucknell and its community would become another suburban 'village' of Bicester. As OCC note in their introduction to their response to this application, it is outside the scope of the Adopted Plan; *'It is noted that the application site boundary extends beyond the Local Plan allocation boundary to the north, towards the settlement of Bucknell.'*

1.2 The applicant has deemed heritage and historic assets in Bucknell as 'out of scope' (ES CH 10 Appendix 10.5 Heritage Impact Assessment). There is no explanation as to why these are deemed to be 'out of scope'.

1.3 The Cherwell Adopted Plan states that *"Consideration should be given to maintaining visual separation with outlying settlements."* The dramatically extended application to the site would virtually touch key heritage aspects of the village.

1.4 The applicant has failed to assess the impact of additional traffic in Bucknell. A reasonable assumption can be made of an additional 6,000 cars into the wider area, the majority of which would travel directly through Bucknell to get to either Bicester or the M40. This would inevitably lead to congestion, pollution and predictably, road accidents.

1.5 Bucknell villagers, young and old, regularly use the village lanes to exercise, walk their dogs and go to and from Church, Village Hall and park on foot. This is already dangerous at times with traffic volumes and speeds. The lanes were not designed for the existing volume of vehicles and they will not cope with the additional traffic this development would bring. This would dramatically impact day to day village life.

1.6 I am mother of two children who use our local bus stop to get to and from school. The bus stop is situated on an already busy road used as a rat run in the mornings. Drivers are not slowed by existing speed bumps, never mind 'speed cushions' as proposed by the developer. It is only a matter of time before there is a serious accident if this development is permitted to go ahead.

## 2. Bicester area Infrastructure

### 2.1 Flooding

2.1.1 The applicant has stated that the development proposed is in an area of flood risk. The Adopted Plan states that there should be '*no development in areas of flood risk*'. The applicant states in its Flood Risk Assessment that '*Thames Water welcomed the opportunity to comment on the scoping report and "are satisfied that the report has considered the Water and sewerage needs of the development as set out in the EIA Regulations 2017*'. However, without having sight of the scoping report and response from CDC, it is unclear whether Thames Water were commenting on the scoping report for Bicester 1 generally, or this specific application.

2.1.2 It is clear, however, that Thames Water were not involved in the 'detailed investigations' undertaken to assess flood risk. Thames Water themselves state in their consultation response (DTS Ref: 70942) that

*'Thames Water has identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal.'*

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

2.1.3 Whilst Thames Water go on to state their conditions for development, it is clear that the applicant has not consulted meaningfully with Thames water in an area that they know to be a flood risk. In fact, Thames water comment twice in their response that they have tried to make contact with the applicant but they have not been able to do so.

2.1.4 Residents of Bucknell have suffered the serious effects of flooding over the past few years. Thames water are regularly at work in our village trying to clear drains to ensure further flooding does not take place. The infrastructure cannot cope with what is already in place.

2.1.5 It should also be noted that OCC, the lead local flood authority for this application, have objected to the application.

### 2.2 Health Services

2.2.1 The OCC response to the applicant's Health Impact Assessment is as follows;

*'This Health Impact Assessment is both high level and generic. It has not identified the local health priorities that may be impacted by this development nor provided adequate evidence that positive impacts will be delivered and negative ones mitigated.'*

*Overall, it is an inadequate assessment and needs significant revision.'*

2.2.2 In their response, the Oxfordshire Clinical Commissioning Group (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.'*

2.2.3 OCCG estimate the development as likely to generate an additional list size of c7,440 patients. The reality is that not only will these patients have no meaningful health provision but it will also impact negatively on the existing population and the Bicester area.

## 2.3 Transport Services

The assessment of impact on transport and traffic in this application has been made based on some highly questionable assumptions:

- 2.3.1 The applicant has based projections on 2014 data without any adjustments for additional developments which have since taken place in Bicester and surrounding areas:
- 2.3.2 The National Highways response to the application states '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.'
- 2.3.3 The applicant has not used recent developments at Kingsmere and Elmsbrook as the basis for modelling likely vehicles per household:
- 2.3.4 It was claimed at the 'consultation' meeting in Bucknell that most residents would not leave 'Hawkwell village' on a daily basis. That is a ridiculous assertion with no evidence to support it:
- 2.3.5 The applicant clearly knows that transportation is an argument it cannot win. The impact would be enormous:
- An additional 6000+ vehicles on the roads in the Bicester area:
  - Regular grid lock at the B4095 junction with Howes lane (under the ten ton bridge). This is close to an existing primary school (Kings Meadow) with a significant pollution impact:
  - Increased pressure on already struggling local road networks: A41, A34 and beyond:
  - An inevitable dramatic increase in traffic through Bucknell as already mentioned above.
- 2.3.6 In addition, to the above infrastructure concerns, it is noted that Thames Valley Police have also expressed their concerns regarding the proposed development.

## 3. Loss of countryside and environmental impact

3.1 The NPPF states that planning policies and decisions should recognise *'the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'*

3.2 The applicant has taken a mathematical approach to valuing the character and beauty of the countryside. It has assessed the bio-diversity value of the area it proposes to develop as 'generally low'. It also makes the assessment that the 'do nothing' effect of not developing is likely to be a deterioration in the quality and value of the area. This appears to be based on the assumption that the land would not be effectively managed going forward (ES Chapter 9 Redacted

9.4.17). For example, ‘*depending on management practices, all ditches could become increasingly overgrown*’ and ‘*hedgerows would become increasingly outgrown*’. There is no evidence to support that this would be the case or why that assumption has been made.

3.3 The applicant’s ecological submission has 53 paragraphs (9.5.7 - 9.5.60) on the individual species and habitats impacted by this development. Individually they are assessed as having ‘minimal impact’. Soil health, insect, micro-organism life and food production is not taken into account and there is no assessment made at a higher level or of the cumulative effects overall.

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.”*

3.4 It is crucial that CDC take a step back from this and consider what is actually happening. The majority of the open arable land will disappear under housing. ‘Green Infrastructure’ is not the same as open fields, natural hedgerows and arable land. Flood lit playing fields and other green spaces will create significant light pollution and reduce the local area’s independence and ability to produce food for ever.

#### **4. Process and consultation.**

4.1 NPPF 3.16.b states that;

*Plans should be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*

4.2 The applicant has demonstrably failed to meet this objective. For example:

4.2.1 The applicant notified a number of householders, but the selection of these houses seemed to be at random:

4.2.2 The Parish Council of Bucknell was not properly consulted on the application and was not given reasonable time to respond. The applicant consulted with CDC directly on the scope. (It is noted that there is no documentation regarding the timing and content of these discussions on the planning portal). The vast difference in time allowed to make the application compared to the time residents have had to consider and respond, is unreasonable and likely to be unlawful.

4.2.3 Several bodies refer to the lack of consultation in their objections and comments.

The application should be refused.

Beth Dodson-Wells