

Huscote is a beautiful, unspoilt area of Banbury countryside. It contains remnants of the agricultural heritage of the Banbury area, links to the once famous Banbury Cheese, and the biodiversity supports an abundance of wildlife. At a time of climate crisis, when Government is working hard on Nature Recovery Strategies, it seems abhorrent that any consideration would be given to destroy what we already have in this area.

In relation to the application for outline planning permission for large scale commercial development in this area, we would like to outline our objection and provide initial thoughts; particularly because we consider that the application should be rejected on the grounds of prematurity. Please appreciate that there are a lot of documents to review and we will revert in more detail once we have had the opportunity to fully review, please expect further comments on the lawfulness, accuracy and level of detail contained within the EIA. As members of the public, you can appreciate that this will take some time and we would request an extension to the comments due date. We would also request that we are provided a copy of confidential elements of the EIA that have not been publicised, with our proximity to the proposed development, it is imperative that we have sight of, and the opportunity to review and comment on, all available information.

It is our strong opinion that the location of the site is unsuitable for development of this nature. Developing the area would have a hugely detrimental impact on our countryside and local heritage; increase traffic and place further pressure on the M40 roundabout which is already insufficient for the volume; increase noise from alarms and machinery for nearby homes; remove the natural habitat for wildlife and birds and increase flooding risks by removing permeable surfaces.

Cherwell District Council Local Plan

As part of Cherwell District Council Local Plan Review 2040 Call For Sites, speculative proposals were submitted for the areas of both Nethercote (LPR-A-185) and land north of the A422 (Huscote) (LPR-A-034 and LPR-A-168) these proposals would in effect see both areas of countryside turned into Industrial Estates. Neither of these areas are currently within the Local Plan and therefore not earmarked or assessed for development. Our understanding from the published process is that, following the close of the consultation in November 2021, that Cherwell District Council are currently reviewing the proposals submitted in the Call For Sites and giving due consideration to consultation responses. Stakeholders are currently awaiting to learn whether either proposal will be supported for inclusion into the next stage of the Local Plan Review 2040 and this is not expected to be published until later this year.

The location of the proposed development was previously rejected from the Local Plan due to the significant and harmful impacts on the area. This is detailed extensively in a report to Cherwell District Council by Nigel Payne BSc (Hons), Dip TP, MRTPI, MCMI, an Inspector appointed by the Secretary of State for Communities and Local Government. The report on the examination into the Cherwell Local Plan is dated 9th June 2015 and the location is referenced "Banbury 15 – Employment Land NE of J11 M40" Paragraphs 199-211 detail the reasons that the location is not suitable for development and reference matters such as: detrimental impact on local landscape; particularly the rural areas; reduced need for this type of development due to other developments across the district; lack of evidence of viability; expected traffic movements and lack of infrastructure to support this and the need for significant highway improvements in the area.

The proposed development does not accord with the spatial strategy of Cherwell District Council Local Plan, which seeks to achieve sustainable economic growth by limiting development in the rural areas

Prematurity

We urge Cherwell District Council to reject this application on the grounds of prematurity.

The Local Plan process allows a series of consultations, over a period of time, allowing input from a wide range of stakeholders and includes public engagement and consultation. At each stage, an update on the reviews of consultation can be presented and new consultations sought. Once in draft form, the process allows for public examination of the Local Plan and anyone with objections has the opportunity to be heard by the planning inspectorate. Consultations include a whole variety of experts, and allow for public consultation and engagement. To consider using a greenfield site, as prominent and significant as the land in the application, requires this robust consultation that the Local Plan process allows.

Consideration of this application prejudices the Cherwell Local Plan and undermines the current Local Plan Review

The greenfield land in this application, previously rejected from consideration for development in 2015, has had no public consultation prior to this application and we believe that the application should be rejected until such time that the Local Plan review is completed, and adequate consultations have been concluded, allowing for proper scrutiny of the land use.

Lack of Public Consultation

The applicant's statement of community involvement indicates pre-application consultees have raised significant concerns regarding the development and that some significant consultees have yet to respond to the consultation. There has been no public consultation which is paramount for a proposal of this size, on a green field site that has previously been rejected from Cherwell District Council Local Plan.

Detrimental Impact on Countryside

The proposal does not respect the character of the countryside nor the history of Banbury held in this area. The area of Huscote Farm is significant to Banbury and nearby West Northamptonshire, it is the first thing that visitors see when leaving or passing over the M40. It is currently rural, open countryside containing remnants of Banbury's agricultural past. To industrialise this area would be devastating for the environment and would significantly deteriorate the landscape view in this fundamental area.

We note that the application contains only a narrow selection of viewpoint images. Appendix 1 to our objection shows a series of eleven aerial photographs of the proposed site and the landscape character of the surrounding area

The Oxfordshire Historic Landscape Characterisation Project, Capacity For Change, shows the landscape in the location of the application to be Level 5: High Sensitivity to Urban Development. The project identified ways in which the creation of large-scale urban development might have an effect on historic landscape character. The map is included in Appendix 5 to our objection.

Referring specifically to paragraphs 200+201 from the Report on the examination into the Cherwell Local Plan in 2015:

200. In this area the land is also fairly flat and new employment buildings would be largely seen in the context of the motorway in public views from the east, north and south east, with some large existing buildings beyond. This contrasts strongly with the rising ground to the east of the A4225, which is also principally open agricultural land but clearly of a higher landscape sensitivity to new built development, including the land below the higher slopes of the hill in the easternmost part of the overall site.

201. Development of the land east of the A361, as noted in earlier landscape assessment work for the Council (2013), would have a significantly detrimental impact on the local landscape, intruding as it would into presently open countryside currently in agricultural use with inevitably large industrial and warehouse buildings. In particular, it would materially extend the built-up area of Banbury to the east and lead to a significantly harmful erosion of its rural setting on this side of the town.

The nature of the rural landscape character when viewing to the North, East and South of the location is evident in Appendix 1 (3,4 +11) to our objection

Heritage

Building in open countryside destroys the value of local heritage assets to the authority and local community, and in some cases, nationally.

The fields in the site are medieval ridge and furrow landform. The ridge and furrow is well-preserved and therefore it is unlikely that the ground has been disturbed significantly since the medieval times, making it impossible to have any detailed knowledge of what lies beneath or what the land may have been previously used for. The ridge and furrow is clearly visible in Appendix 1 to our objection, with Appendix 1 (1 + 11) showing particularly, how well preserved the ridge and furrow is. The area North of the location is recorded in NCC Archaeological Assets Ref Monument ID MNN132348

Huscote Mill

There were three mills recorded for Chacombe at Domesday, one of which may have been Huscote Mill as Hulescote Mill is named on Eyre's 1779 map. The mill is now demolished but earthworks remain. Registered on Northamptonshire HER No 6174/1, which shows the following information:

"Huscote Mill is present on Eyre and Bryant's county maps and on the unpublished OS map of 1811 as Hulescote Mill. Whilst no standing remains of the mill are recorded, modern aerial photos suggest that this site has not been re-developed and remains as open ground.

1086 Domesday Survey records Cewecumbe with three mills rendering 16 shillings

1133-89 Chacombe Priory founded during reign of Henry II and the first endowment included a mill in Chacombe

1786 William Falkner of Huscote Mill, in the parish of Chalcomb, miller and farmer insured his house in Oxfordshire

1927 Described as "Not in work"

1928 Willima Jarvis, sausage skin manufacturer, occupied the mill

Shown as Hulescote Mill on Eyre's 1779 map; as Huscote Mill on Bryant's 1827 map and as Huscote Mill on 1834 1 inch OS map"

Northamptonshire HER record 6174/1/1 also identifies the earthworks of the mill leat for Huscote Mill (Medieval to Mid-20th Century - 1066 AD? to 1950 AD?)

Appendix 4 to our objection shows the location of Huscote Mill on a map dated 1888-1889 and Appendix 7 shows an image of Huscote Mill from a postcard dated 1906

The application appears centralised only on heritage assets within the site and fails to give any consideration to heritage of surrounding areas, the Listed Building at Seal's Farm is adjacent to the location and the proposal would negatively impact on the characteristics surrounding that building. Appendix 1 (9) to our objection shows clearly the close proximity of the proposed site to Seal's Farm

Much wider consideration of heritage assets and designations needs to be considered, the Zone of Theoretical Visibility in the application shows a large area impacted and therefore this area should all be considered.

Appendix 2 to our objection shows an extract from Northamptonshire County Council Conservation Map, showing the immediate area surrounding the location, that falls within Northamptonshire. As well as the aforementioned Listed Building at Seal's Farm, the map shows numerous Historic Environment Assets, Listed Buildings, Conservation Areas as well as the scheduled monument at the site of the former WW1 Filling Factory. There is additionally a large area South of the site, designated as Special Landscape area.

As part of their ongoing programme for the current year, Cherwell District Council have scheduled a review of local heritage assets as well as a review of conservation area designations within the area surrounding Huscote. Cherwell District Council should have the opportunity to carry out their review in order that the impact on those heritage assets can be fully considered as part of the application

Loss of Biodiversity

The area provides much opportunity for Government Nature Recovery Schemes. Development of this area will destroy nature and runs counter to the Government goals for nature recovery through their 25-year environmental plan. The site contains areas of species rich grassland of which Banbury is lacking in general & therefore, given the global climate crisis, it would be more logical to expand the areas we have locally rather than destroy them.

As the biggest plants on the planet, trees give us oxygen, store carbon, stabilise the soil and give life to the world's wildlife. Not only are trees essential for life, but as the longest living species on earth, they give us a link between the past, present and future. There is an abundance of mature trees across the site, trees of a significant age, the benefit to the environment of which cannot be offset in any meaningful way. Appendix 3 to our objection shows an extract from Cherwell District Council conservation map. This shows approximately 42 TPOs on trees across the site, many of which overlap the proposed location of units within the proposals

The boundaries of the ridge and furrow fields are marked by hedgerows. These hedgerows are irreplaceable pieces of living history as well as providing quality habitat for wildlife. The older a hedgerow, the more it can support the greatest diversity of plants and wildlife, and is more valuable for ecology due to the maturity, not only of the hedgerow but the soil and fungi too. Removal of these hedgerows cannot be offset in any meaningful way. New planting throughout a developed site will provide a biodiversity net loss when we should be aiming for gains. The hedgerow in the area meets criteria that makes it legally protected under the Hedgerow Regulations Act and legally defines the hedgerow as an "important" hedge. The application suggests that the hedgerows are only of moderate quality due to intense management, yet fail to acknowledge the methods to successfully rejuvenate a hedgerow of this age, such as coppicing. Not only are such methods successful, landowners are actively encouraged to improve the quality of their hedgerows in this way by organisations such as People's Trust For Endangered Species.

The loss of biodiversity that would occur in the event of the proposed development would lead to the loss of much natural habitat for wildlife and birds. The area is an established, natural habitat for much wildlife, such as Muntjac deer, foxes, badgers, bats, hedgehogs, birds of prey, including owls, rare birds such as woodpeckers, insects and bees along with many species of small mammals. The area with its proximity to the M40, A361 and the A422 gives the wildlife an unusual protection from human interference or disturbance.

The land at the location of the proposed development is not accessible to the public, and passers by are likely to be travelling in a vehicle. This means that it could be assumed that a lower level of records would be found at TVERC due to the location of the land. This means that the lack of records does not conclude a lack of species, merely the lack of ability for those to be recorded.

Noise

Such large-scale commercial development gives no consideration for residents in nearby areas and would bring unreasonable disturbances from units such as alarms, machinery and HGVs. Regularly, alarms can be heard sounding at Central M40 site on the other side of M40, these are distant enough, masked by traffic hum to remain inconspicuous to residential homes in the area, but it is noted that caretakers of the units rarely attend to address the noise, with alarms regularly left ringing for whole weekends and holiday periods such as Christmas. Noise of this nature in such close proximity to residential properties would be unacceptable due to the day and night nature of the anticipated noise levels once a site of the nature proposed were operational.

Adverse Impact On Infrastructure and Traffic

The current infrastructure capacity is insufficient at the M40 roundabout and further development would have an unacceptable impact on local roads. Since the building of the M40, J11 is a bottle neck for traffic trying to reach Banbury from areas of Northamptonshire such as Middleton Cheney & other numerous villages, Brackley, Towcester, Daventry, Northampton as well as anyone travelling South or North on the M40. All of this traffic must come across J11 roundabout and this is already incredibly problematic.

The recently consented Frontier Park has only exasperated the problems with congestion. Before any further development is considered, it would be absolutely necessary to resolve the issue of the current infrastructure in a sustainable way.

Appendix 6 shows the impact on the traffic when there is an incident or roadworks in the area.

Accessibility and Highways Safety

The area is not easily accessible for any potential jobs that could be created by the proposed development. 3.10 of the applicant's Planning Statement states that pedestrian and cycle linkages are designed into the site to improve connectivity with Banbury. Without significant infrastructure changes in the surrounding areas, there is no safe route to facilitate this. This is further corroborated by the current LCWIP consultation by Oxfordshire County Council and Cherwell District Council, who are currently considering proposals for safe routes in the area.

This would therefore mean that if the proposal were permitted, all workers of future units would be accessing the site by vehicle, further increasing traffic volumes in the area and in contrast to environmental policies.

Lack of Evidence of Economic Benefits

The applicant proposes a development of B8 units, typically large warehousing used for storage or distribution. The applicant claims that this could create up to 1915 FTE jobs, yet nearby B8 units have created significantly lower numbers of FTE jobs per sqm

There are B8 units already established in the area where difficulties are encountered filling the jobs available. This would suggest that whilst there are people in the area seeking employment, employment created by B8 units is not the kind of work that is required to meet that need. In contrast, those small businesses and start ups requiring small, light units are having to travel out of the area to find appropriate availability.

It is not expected that B8 units in this area would create the volume of jobs suggested by the applicant, in fact, the recently approved, Frontier Park, used the argument of low FTE job creation in mitigation of concerns surrounding traffic.

Within the Economic Benefits report, it is suggested that the scheme will contribute towards developing the Oxford-Cambridge arc. The Oxford-Cambridge arc, at this time is a proposal and one that, it was reported in February 2022 by local councils, that Central Government appear to have stepped back from.

Drainage and Flood Risk

Flood risk is a huge concern. development of the area would create an increased risk of flooding by removing permeable surfaces, nearby areas have required much work against natural flooding and the lower grazing land is already prone to flooding. Lying on the lower levels, the area will absorb groundwater running from the surrounding higher ground. With permeable surfaces removed from both the slopes and lower land, this water will need to go somewhere. Owing to the slope of the area, land slip is also a concern if development were to be permitted. On the other side of the A422 to Huscote, in Nethercote there is a string of underwater springs, there is little knowledge of what lies beneath the ground at Huscote. Nethercote lies on lower land too and already suffers water logged fields at times, particularly in the corner by J11, as seen in Appendix 6 to our objection. Prior to the building of the A422 dual carriageway, this field was part of a larger field, the remainder of which falls South West within the proposed site.

The application site is not located within an Internal Drainage Board district and despite the flood risk, it does not appear that ongoing future management of water levels have been considered in any depth.

Summary

We would like to believe that Cherwell District Council would not give any consideration to such a proposal. As previously mentioned, we would urge you to reject the application on the basis of prematurity. If that is not considered appropriate, we would urge the Planning Committee to refuse the application. Please advise if an extended timescale for further comments is acceptable to you and also, please keep us fully informed on the progress of the application and any publicly accessible meetings where the application will be discussed.