



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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James Kirkham, Principal Planning Officer
Cherwell District Council
Bodicote House, Bodicote
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3 November 2022

Dear Mr Kirkham

Ref : 22/02866/OUT Outline Application for residential development of up to 120 dwellings in land east of Ploughley Road Ambrosden

CPRE strongly objects to this development on the edge of Ambrosden which spreads the village further out into the neighbouring countryside, places further pressure on local facilities and impacts on local wildlife.

Community Involvement

Whilst CPRE acknowledges that the developer has discussed the development with local representatives including the local parish council, CPRE would question how effective this consultation has been given that this application has already received around 70 objections from local residents. A meeting took place on the 16 June between the developer and village representatives and the developer claims that concerns raised at that meeting have been taken into account in their final planning application. CPRE questions why the applicant chose not to liaise again with the village before submitting their planning application.

One of the requirements of policy Village 2 in the current local plan, which sets out criteria for consideration of development sites, is that developments should contribute and enhance the built environment. A requirement of Policy ESD13 in the local plan is that developments should be consistent with local character. Existing residents are often the best judges on whether a development is consistent with local character. There is no evidence that they have been consulted on the build design, nor has any substantive detail been provided in the development on the types of housing that will be provided.

Overdevelopment of the Village

CPRE believes that there has been 4 residential applications approved for Ambrosden in this local plan period resulting in what we believe is a build total of 313 residences. This is the Ambrosden third planning application that CPRE has responded to in the last two months. If these are all approved, there could be a further 250 houses built in Ambrosden. None of these are in the approved development plan.

One of the strategic objectives for sustainable development, outlined in para SO12 of the current local plan, is that development should be focused on Cherwell's sustainable locations, thus helping to conserve and enhance the countryside and landscape and the setting of Cherwell's towns and villages. Furthermore, an objective of Cherwell's policy on villages, outlined in para C254 of the current local plan, states that unanticipated development within the built-up limits of a village should be of an appropriate scale for that village.



The applicant claims that as Cherwell District Council is behind on its five year housing target, the local plan is out of date and therefore the tilted balance, as per the National Planning Policy Framework (NPPF) para 11(d)ii, is engaged, hence a presumption in favour of sustainable development. However an application can be refused if the adverse impacts of a development outweighs its benefits.

The developer states in their planning statement that the number of houses to be built in category A villages, as per the local plan, should be not be viewed as a cap. However this development should be seen in the context of what has already been built, and other housing developments that are awaiting approval. Current figures show that for its size, Ambrosden has already done much of the “heavy lifting” in contributing to the planned Cherwell District housing category A village total contributing 313 houses towards the target for category A villages. CPRE believes that there are 23 category A villages in Cherwell and also considers that Ambrosden, has contributed significantly more houses for its size in comparison to any other Cherwell category A village. If all of the latest proposed developments earmarked for Ambrosden are approved, then the population of the village could be increase by up to 50% when compared to the 2011 census figures even though services, facilities and road infrastructure have remained broadly the same.

It is CPRE's contention that when assessed against the relevant policies within the local plan, and in particular the criteria outlined in local plan Villages 2, this development represents an unjustifiable and unwanted overdevelopment of Ambrosden, the harm of which outweighs any benefits.

Further analysis of the development set against Local Plan Policy Village 2 is provided below.

The development is well located to services and facilities

Para C254 of current local plan states that unanticipated development in villages should not unnecessarily exacerbate travel patterns that increase use of the private car. CPRE would question whether services and facilities are of a scale and quality to adequately meet the demands of recently completed developments. Responses from the Parish Council and others suggest that the school's primary school is over-subscribed and the catchment secondary school, which is not in the village, does not currently have a sixth form. The local convenience store offers a limited supply of provisions, which is unlikely to provide a viable alternative to larger stores in Bicester. The local garage does not provide a fuelling facility and the village pub is of limited size and licence. CPRE does not believe that the option of an infrequent bus service to, for example, the nearest main settlement in Bicester, is a sufficiently attractive travel option to using a motor vehicle and questions the extent to which the site can be made suitable for sustainable travel options.

The development can provide vehicular access and egress and necessary infrastructure

Concerns have been expressed by the Parish Council and other objectors as to the adequacy of infrastructure and in particular, the road offering. Safety concerns have been expressed about the proposed entrance and exit to/from the development. There are also concerns as to whether this development will increase redirected traffic flows. emanating from ongoing work on the A41, through the village and whether the impacts of this have been adequately addressed in the development proposal.



The development should utilise land previously used or of lesser environmental value

The development is neither using land previously used and CPRE contends that the proposed development site is not using land of lesser environmental value. CPRE recognises that the term lesser environmental value is difficult to define. However using the applicant's own biodiversity net gain assessment, which assesses the baseline value of habitat at 52.38 units, this is likely to be significantly higher than that of a brownfield site. CPRE would contend that it cannot be reasonably argued by the applicant that this land is of a lesser environmental value.

The development avoids significant adverse impacts on wildlife and heritage

The applicant states that there will not be an adverse impact on wildlife assets and heritage. Local Plan Policy ESD 10 and NPPF para 174 require developments to demonstrate a biodiversity gain and there is an additional requirement from Cherwell District Council for developments to provide a 10% biodiversity gain. Having reviewed the calculation, CPRE is concerned as to whether a good condition can be achieved for 3.515 hectares of created other neutral grassland. CPRE would question whether a moderate condition score is not more realistic, particularly in the absence of a detailed landscape management plan, which would have enabled consultees to evaluate whether a good condition is feasible or not. A moderate condition score would reduce the applicant's overall net gain assessment to below the required 10% gain in biodiversity.

The development avoids use of best and most versatile agricultural land

Whilst the developer has claimed that the existing site's agricultural land is graded as poor by Natural England, the developer has not provided any analysis to support this. Does this mean that most of the land is of poor quality but some may be good? An analysis of land quality should be able to be reviewed by consultees. CPRE is concerned that arable land, some of which may be good, is being developed for housing given the national imperative to ensure future food security. It should also be noted that agriculture does provide a means of local employment. This development, along with all of the completed and proposed housing developments in Ambrosden, do not provide local employment opportunities which runs counter to the current local plan para B44. This states that the focus of the plan should be on ensuring that housing and employment is located in the same place.

The Development avoids significant landscape impacts

The application, if approved, would allow built form on greenfield land and will have inevitable significant landscape impacts. CPRE believes that the extension of the built form of the village harms the character and rural setting of the village. The applicant's Landscape and Visual Statement recognises that there will be a number of adverse landscape impacts.

At the construction stage, the applicant readily states in their landscape visual document that during construction the development will have a major/moderate adverse impact at site level. This is very important to current village residents who have endured a number of similar developments in recent years. In this context a temporary degree of disruption is of little comfort to exiting residents.

From when the site becomes operational, the applicant acknowledges that the 'visual and sensory character of the site would change substantially as a result of implementation'. With regards to visual amenity, the applicant acknowledges that there will be a major/moderate to



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moderate adverse effect for right of way users. Similarly there will be a moderate adverse impact for residents at Ploughley Road. There is concern from both Ambrosden Parish Council, and expressed in some of the objection letters from residents, that this development will dominate the landscape and the planting of trees will not adequately mitigate the impact of this due to the topography of the land.

Mitigating and adapting to Climate Change

The applicant's planning statement provides minimal reference to the mitigation and adaption to climate change. CPRE would expect to see an outline of the developer's proposals on house type in either the planning, or design and access statements, so that these can be commented on by consultees, rather than being taken as a reserved matter. CPRE cannot see any evidence that the development will be built to a BREEAM very good standard using sustainable construction methods as per local plan policy ESD3. It is unclear as to what heating systems will be utilised and whether this development is considering use of combined heat and power systems, as required by local plan policy ESD4, and/or whether consideration has been giving to installing solar panels on property roofs.

Conclusion

CPRE believes that the development falls short of the criteria for housing development in rural areas set in Local Plan Village Policy 2. The village has already undergone a considerable level of housing growth and that overconcentration of dwellings in one category A settlement has to be a relevant consideration. CPRE contends that notwithstanding the requirement for Cherwell to meet its housing target, that any benefits from this development will be more than outweighed by its adverse impacts and that this application should therefore be refused.

Yours sincerely

Nick Dolden

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CPRE, Cherwell District

Copies to: Robin Oliver, Chairman Cherwell District CPRE
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