

Phoenix Cottage
Nethercote
Banbury
OX17 2BN

30 March 2023

RE: Application 23/00501/REM

Dear Sirs,

We wish to strongly object to this application on the following grounds:

Environmental Impact

The current site is currently green field agricultural land surrounded by mature trees and hedgerows; important habitats for wildlife

Living nearby, we know that this area has a massive range of wildlife, including (but not limited to): bats, deer, weasels, small birds (such as tits and sparrows), medium birds (such as protected lapwings and woodpeckers) and large birds (such as owls, buzzards, kites and pheasants)

From the documents provided, the applicant appears to be planning to remove the existing trees and hedgerows on the west side of the site, adjacent to the M40 slip road, which would result in significant habitat loss.

The few trees and hedges that remain will be adjacent to concrete car parks and solid buildings rather than open fields required for hunting and foraging, and will therefore lose significant habitat value and biodiversity.

Construction activity to build the warehouses and car parks will be taking place immediately adjacent to these trees and hedges; this will significantly disturb or displace existing wildlife, much of which has already been displaced due to the construction of the other warehouses. It is unlikely that once gone, it'll ever return.

Construction on this site will also remove the last remaining 'green corridor' for wildlife in the trees and hedges both sides of the M40 to access the rural areas of Huscote Farm and Nethercote on the east side of the A361.

Visual and Landscape Impact

This site will be visible for miles due to its location on the edge of the valley adjacent to the M40 and the proposed height of the building.

The giant ugly grey box proposed by the developer has zero architectural merit, and its massive size will cause it to loom over the A361 and M40 junction, making it the first thing visitors will see when approaching Banbury from the east.

This is not a first impression of Banbury that will encourage the leisure visitors and tourism that the town centre desperately needs to keep it alive.

The existing warehouses on Frontier Park are already an eyesore when approaching Banbury on the M40 and A361, and should never have been allowed in the first place.

The council certainly shouldn't be letting the situation deteriorate any further, and should have insisted on additional vegetation screening for the existing site before approval!

Impact on local residents

The site is only 500m from the nearest properties in Nethercote, and only slightly further from properties in the north east corner of Grimsbury.

This means that the construction and operation of a warehouse on this site will have a much greater impact on local residents than the existing units to the north.

Residents already have to suffer the constant noise, vibration, light and air pollution caused by the existing warehouses adjacent to the M40 and additional road traffic that they generate.

Even without the warehouse proposed in this application, this is only going to get worse if and when the other two units on Frontier Park are ever occupied and come into use.

Allowing construction on this site will only expose these long suffering residents to more pollution, particularly noise pollution from vehicles and alarms, and air pollution from vehicles.

Lack of sustainability

The development would result in the loss of existing agricultural land that is suitable for arable or grazing purposes.

At a time when the UK is concerned about its future food security (due to the current global supply chain problems, as well as the ongoing conflict in Ukraine), it seems foolish to allow valuable farmland to be irretrievably lost to unsuitable development.

The applicant is not proposing to install solar panels on the building. Given that large swathes of agricultural land in the district are currently under threat from 'solar farms', we believe that Cherwell District Council should insist that all new commercial developments should be covered in solar panels to meet renewable energy targets, before even considering allowing solar farms on green field land.

Impact on air quality

Any commercial development will have an impact on the air pollution in the area, which has been shown to have an adverse effect on wildlife as well as nearby residents.

It is clear that the development of an additional warehouse will create significant additional vehicle movements (both within and to/from the site), a large proportion of which will be the most polluting vehicles; diesel HGVs.

This will result in an unavoidable increase in both NO₂ and particulate emissions.

The Air Quality to the north of Banbury is already extremely poor due to the proximity of the M40 and the large number of HGVs accessing the existing industrial areas. Part of the area is already included in an Air Quality Management Area.

Allowing construction of more warehousing and the resulting increase in lorry movements will only increase the level of air pollution, causing more misery for residents and damage to local wildlife.

We are also concerned that Carrdus School is less than 1km from the site and poor air quality has been shown to have a disproportionate damaging effect on children's lungs

Impact on light pollution

Banbury already causes a massive amount of light pollution in this area. The current green buffer to the east of the M40 gives wildlife some safety from harm, it also provides an important buffer to the surrounding residents, however the two existing units on Frontier Park have already begin to erode this, and allowing further development of the site will only make it worse!

Traffic and Travel

Junction 11 of the M40 often cannot cope with the amount of traffic using it and when there is an incident or roadworks in the vicinity, this whole area frequently grinds to a crawl. The A361 and the A422 are simply not fit to handle the significant additional daily vehicle movements that this development would create.

This is without the additional traffic that will be caused if/when the other warehouses on Frontier Park finally find a tenant and enter operation.

Congestion on the A422 already causes motorists to ignore the 'No Entry' sign at the north end of Banbury Lane and rat-run along the narrow single track lane through Nethercote, leading to safety concerns for residents, cyclists and pedestrians who all use this route. Extra traffic from this development would cause this to happen more frequently.

Construction and operation of this site also coincides with construction work on HS2. Vehicles associated with both will be using the A361 and M40 junction, leading to a significant increase in construction vehicle movements during this period.

In past applications for development of this area, it has been suggested that traffic impact could be mitigated by an additional link road between the A422 and Overthorpe Road. However, it is clear that those proposing this solution have never visited the area concerned. Such a link road would cause massive devastation to the rural hamlet of Nethercote and the quiet historic village of Overthorpe.

It would also overwhelm Overthorpe Road and the bridge over the M40, neither of which are suitable for a high volume of vehicular traffic, let alone a constant stream of HGVs!

Public Transport & Active Travel

There is virtually no infrastructure in the area to provide this development with any form of access other than vehicular. There is no pavement for pedestrians or safe cycling route along the A361, more importantly there is no safe means for pedestrians or cyclists to cross the M40 junction.

The site is too far from the main transport hub at Banbury Railway Station for it to be within easy walking distance, discouraging employees from arriving by train.

Bus services are infrequent and limited to working hours only (so of no use for a 24/7 shift operation) and Stagecoach has already proposed withdrawing one of the few routes that passes the site.

Although the applicants have previously suggested that pedestrians and cyclists could reach the site via Banbury Gateway and the tunnel under the M40, this would be a significant detour. It is also a very isolated and barely lit (if at all) which makes it totally unsafe for women and vulnerable people, particularly during the hours of darkness.

It is clear, therefore, that most employees will arrive by car, which is inconsistent with council policies to reduce car journeys and associated carbon emissions.

Additional traffic congestion caused by this development will also increase in additional delays to existing bus services, making them less attractive and require more vehicles and drivers to maintain the existing frequency.

Should the development be allowed to proceed, we would expect Cherwell District Council to require the developers to provide Section 106 funding towards Active Travel improvements in Banbury based on the priorities set out in the Draft Local Cycling and Walking Infrastructure Plan (LCWIP).

Impact on flooding management

The Northamptonshire Flood Toolkit and the Oxfordshire Treescapes Project maps (among others) clearly show that the south west corner of the site is at risk of flooding from surface water, and therefore is an important natural flood management area.

Adding additional permanent impermeable ground covering on the site is likely to lead to additional floodwater running off the site into adjacent low lying areas. This includes areas with residential properties (for example, Chacombe and Nethercote) as well as the M40.

Economic Impact

The application proposes creating employment of Class B8 – Storage or distribution.

Banbury already includes huge amounts of this type of employment, many warehouses, including the two immediately adjacent, are still awaiting tenants and existing employers are struggling to recruit and retain staff.

This will only get worse as Brexit reduces the amount of cheap unskilled labour available from the EU.

Any additional jobs created are unlikely to benefit residents of Banbury (who are already spoiled for choice) and so potential employees would need to travel in from further afield, leading to additional vehicle movements on the M40, A422 and other parts of the area's road network.

These jobs are also likely to be low-skill and low-wage positions, not the high-skill, high-wage, high-tech and manufacturing jobs that Banbury needs to attract people and investment to the town.

The location of the site on the edge of Banbury means that employees will be unlikely to visit the town centre shops and facilities (e.g. to buy lunch) so it is unlikely to provide any boost to regeneration of the town centre.

Therefore, the council should reject this application because any benefit from new employment does not justify the environmental damage from building on greenfield sites.

Conclusion

For the above reasons, we strongly believe that this development is unsuitable and unsustainable, and should be rejected.

Should the applicant and council believe that development of this site is necessary, then consideration should be given to:

- Providing buildings that are suitable for high tech, high salary companies that will provide jobs that the people of Banbury actually need.
- Attracting industries that do not require constant HGV movements throughout the day, and only operate during the working week rather than 24/7
- Buildings that are low-rise and architecturally pleasing, to provide a welcoming first visual impression of Banbury to visitors.
- Retention of all existing trees and hedgerows and insisting on landscaping that increases and improves wildlife habitat, rather than destroying and devaluing it.
- Ensuring that all new buildings are sustainable, with solar panels on roofs, adequate cycle storage and sufficient electric vehicle charging provision.
- Ensuring that the development is consistent with the Active Travel priorities for Banbury, as published in the Banbury LCWIP.

Yours Faithfully

Daniel Hill & Andrea Keeping